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**REVISED FINAL FINDING OF SUITABILITY TO TRANSFER (FOST) # 3 FOR  
PARCELS 23,29, 34, 35, AND 36, AND PORTIONS OF 1, 16, 17, 24, 27, 28,  
40 AND 41 (PUBLIC DOCUMENT)**

04/22/2002

NAVFAC - SOUTHWEST DIVISION

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**FINDING OF SUITABILITY TO TRANSFER  
FOR PARCELS 23, 29, 34, 35, AND 36, AND  
PORTIONS OF 1, 16, 17, 24, 27, 28, 40 AND 41  
MARINE CORPS AIR STATION  
TUSTIN, CALIFORNIA**

**22 APRIL 2002**

# TABLE OF CONTENTS

| Section  | Page     |
|--|----------|
| <b>ACRONYMS/ABBREVIATIONS</b> .....                                    | <b>v</b> |
| 1.0 Purpose.....   | 1        |
| 2.0 Property Description.....  | 2        |
| 2.1 Parcel 1 (Portions).....   | 3        |
| 2.2 Parcel 16 (Portions).....  | 4        |
| 2.3 Parcel 17 (Portions).....  | 4        |
| 2.4 Parcel 23.....   | 5        |
| 2.5 Parcel 24 (Portions).....  | 5        |
| 2.6 Parcel 27 (Portions).....  | 5        |
| 2.7 Parcel 28 (Portions).....  | 6        |
| 2.8 Parcel 29.....   | 6        |
| 2.9 Parcel 34.....   | 7        |
| 2.10 Parcel 35.....  | 7        |
| 2.11 Parcel 36.....  | 8        |
| 2.12 Parcel 40 (Portions).....   | 8        |
| 2.13 Parcel 41 (Portions).....   | 8        |
| 3.0 Regulatory Coordination.....                                       | 9        |
| 4.0 National Environmental Policy Act Compliance.....                  | 9        |
| 5.0 Environmental Baseline Survey History and Findings.....            | 10       |
| 6.0 Environmental Findings.....  | 11       |
| 7.0 Environmental Findings in CO Areas.....                            | 12       |
| 8.0 Use Restrictions and Notifications.....                            | 14       |
| 8.1 Notification - Pesticides.....                                     | 15       |
| 8.2 Notification - Polychlorinated Biphenyls.....                      | 16       |
| 8.3 Notification - Radon.....  | 17       |
| 8.4 Notification - Wetlands.....                                       | 18       |
| 8.5 Notification - Prime/Unique Farmland.....                          | 18       |
| 8.6 Notifications And Restrictions - Asbestos-Containing Material..... | 18       |

## TABLE OF CONTENTS (continued)

| Section  | Page |
|--|------|
| 8.6.1 Notifications - Asbestos-Containing Material.....                                  | 19   |
| 8.6.1.1 Buildings/Structures Planned For Demolition Or "To Be<br>Determined (TBD)" ..... | 20   |
| 8.6.1.2 Buildings/Structures Planned For Reuse.....                                      | 21   |
| 8.6.2 Restrictions - Asbestos-Containing Material.....                                   | 22   |
| 8.6.2.1 Buildings/Structures Planned For Demolition Or "To Be<br>Determined (TBD)" ..... | 22   |
| 8.6.2.2 Buildings/Structures Planned For Reuse.....                                      | 23   |
| 8.7 Notifications And Restrictions - Lead-Based Paint .....                              | 24   |
| 8.7.1 Notifications - Lead-Based Paint.....  | 25   |
| 8.7.2 Restrictions - Lead-Based Paint.....   | 28   |
| 8.7.2.1 Residential Buildings.....   | 28   |
| 8.7.2.2 Nonresidential Buildings/Structures .....  | 29   |
| 8.8 Notification - Unexploded Ordnance.....  | 29   |
| 8.9 Notification - School Site Considerations .....                                      | 30   |
| 8.10 Notification - Monitoring Wells.....  | 30   |
| 8.11 Covenant - Additional Remedial Action .....   | 30   |
| 8.12 Right Of Access .....   | 31   |
| 9.0 Finding of Suitability .....   | 31   |

## TABLE OF CONTENTS (continued)

### TABLES

- 1 Buildings and Structures Within Transfer Parcels 23, 29, 34, 35, and 36, and Portions of 1, 16, 17, 24, 27, 28, 40, and 41
- 2 Areas of Concern Within Transfer Parcels 23, 29, 34, 35, and 36, and Portions of 1, 16, 17, 24, 27, 28, 40, and 41
- 3 Former UST/AST Sites Within Transfer Parcels 23, 29, 34, 35, and 36, and Portions of 1, 16, 17, 24, 27, 28, 40, and 41
- 4 Department of Defense Environmental Condition of Property Area Types
- 5 Environmental Factors Considered - Transfer Parcels 23, 29, 34, 35, and 36, and Portions of 1, 16, 17, 24, 27, 28, 40, and 41
- 6 Summary of PCB Transformer Survey and PCB Equipment Inspection Results in Buildings Within Transfer Parcels 23, 29, 34, 35, and 36, and Portions of 1, 16, 17, 24, 27, 28, 40, and 41
- 7 Summary of ACM Survey Results in Buildings Within Transfer Parcels 23, 29, 34, 35, and 36, and Portions of 1, 16, 17, 24, 27, 28, 40, and 41
- 8 Monitoring Well and Surface Water Gauging Locations Within Transfer Parcels 23, 29, 34, 35, and 36, and Portions of 1, 16, 17, 24, 27, 28, 40, and 41
- 9 Notifications and Restrictions Summary for Transfer Parcels 23, 29, 34, 35, and 36, and Portions of 1, 16, 17, 24, 27, 28, 40, and 41

### FIGURES

- 1 Marine Corps Air Station Tustin Vicinity Map
- 2 Transfer Property Location Map
- 3 Buildings and Structures Within Transfer Parcels 23, 29, 34, 35, and 36, and Portions of 1, 16, 17, 24, 27, 28, 40, and 41
- 4 Buildings and Structures Within Transfer Parcel 23, and Portions of 1, 16, 24, and 40
- 5 Buildings and Structures Within Portions of Transfer Parcels 16, 17, 24, 27, and 40
- 6 Buildings and Structures Within Transfer Parcels 29, 34, 35, and 36, and Portions of 28, 40, and 41
- 7 AOCs Within Transfer Parcels 23, 29, 34, 35, and 36, and Portions of 1, 16, 17, 24, 27, 28, 40, and 41

## **TABLE OF CONTENTS (continued)**

- 8 Former UST/AST Sites Within Transfer Parcels 23, 29, 34, 35, and 36, and Portions of 1, 16, 17, 24, 27, 28, 40, and 41
- 9 Installation Restoration Program Sites 1, 2, 3, 5N, 5S(a), 9A, 9B, 11, 12, 13E, 13S, 13W, and 16
- 10 Monitoring Wells and Surface Water Gauging Locations Within Transfer Parcels 23, 29, 34, 35, and 36, and Portions of 1, 16, 17, 24, 27, 28, 40, and 41
- 11 Decision Tree for Asbestos-Containing Material Surveys
- 12 Contamination Base Map

## **ATTACHMENTS**

- 1 References
- 2 No Further Action Regulatory Concurrence Letters For AOCs, USTs, and ASTs Within Transfer Parcels 23, 29, 34, 35, and 36, and Portions of 1, 16, 17, 24, 27, 28, 40, and 41
- 3 Hazardous Substances and Petroleum Products Notification Tables
- 4 DoD Policies on Asbestos, Lead-Based Paint, and Radon at Base Realignment and Closure Properties
- 5 Comments/Response to Comments
- 6 Unresolved Comments

## ACRONYMS/ABBREVIATIONS

|         |   |
|---------|---|
| ACM     | asbestos-containing material  |
| AHERA   | Asbestos Hazard Emergency Response Act                                |
| AOC     | area of concern   |
| AST     | aboveground storage tank  |
| BCT     | BRAC Cleanup Team   |
| BRAC    | base realignment and closure  |
| Cal-EPA | California Environmental Protection Agency                            |
| CERCLA  | Comprehensive Environmental Response, Compensation, and Liability Act |
| CEQA    | California Environmental Quality Act                                  |
| CO      | carve out   |
| DDD     | dichlorodiphenyldichloroethane  |
| DDE     | dichlorodiphenyldichloroethene  |
| DDT     | dichlorodiphenyltrichloroethane                                       |
| DoD     | (United States) Department of Defense                                 |
| DON     | (United States) Department of the Navy                                |
| DTSC    | (Cal-EPA) Department of Toxic Substances Control                      |
| EBS     | environmental baseline survey   |
| EIR     | environmental impact report   |
| EIS     | environmental impact statement  |
| FAD     | friable, accessible, or damaged                                       |
| FFSRA   | Federal Facility Site Remediation Agreement                           |
| FOSL    | finding of suitability to lease                                       |
| FOST    | finding of suitability to transfer                                    |
| FS      | feasibility study   |
| IRP     | Installation Restoration Program                                      |
| LBP     | lead-based paint  |
| LIFO    | lease in furtherance of conveyance                                    |
| MCAS    | Marine Corps Air Station  |
| MCL     | maximum contaminant level   |
| MTBE    | methyl tertiary-butyl ether   |

## ACRONYMS/ABBREVIATIONS (continued)

|           |   |
|-----------|---|
| NEPA      | National Environmental Policy Act             |
| NFA       | no further action                             |
| OU        | operable unit                                 |
| PCB       | polychlorinated biphenyl                      |
| pCi/L     | picocuries per liter                          |
| PEA       | preliminary endangerment assessment           |
| ppm       | parts per million                             |
| RAP       | remedial action plan                          |
| RCRA      | Resource Conservation and Recovery Act        |
| RI        | remedial investigation                        |
| ROD       | record of decision                            |
| TBD       | to be determined                              |
| TCE       | trichloroethene                               |
| 1,2,3-TCP | 1,2,3 - trichloropropane                      |
| U.S. EPA  | United States Environmental Protection Agency |
| UST       | underground storage tank                      |
| VOC       | volatile organic compound                     |

# **Finding of Suitability to Transfer for Parcels 23, 29, 34, 35, and 36, and Portions of 1, 16, 17, 24, 27, 28, 40 and 41 Marine Corps Air Station Tustin, California**

## **1.0 PURPOSE**

The purpose of this Finding of Suitability to Transfer (FOST) is to document the conclusion that real property made available through the base realignment and closure (BRAC) process is environmentally suitable to transfer by deed per provisions of Section 120(h) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Parcels 23, 29, 34, 35, and 36, and portions of 1, 16, 17, 24, 27, 28, 40 and 41, at Marine Corps Air Station (MCAS) Tustin are proposed for transfer.

Parcels 2, 18, 19, 20, and 22, and portions of Parcels 1, 16, 17, 24, 27, 28, 40, and 41 were considered for inclusion in this FOST but are withheld from conveyance at this time due to ongoing assessment and/or cleanup of impacted soil and groundwater in these areas. These carve-out (CO) areas include Installation Restoration Program (IRP) Sites 1, 3, 5N, 5S(a), 11, 12, 13S, 13W, and 16. The CO areas also include IRP Sites 9A and 13E, and portions 9B that have received regulatory concurrence for no further action (NFA). The CO areas include both the impacted areas and buffer zones to allow for the protection of human health during ongoing cleanup and investigation activities.

A Finding of Suitability to Lease (FOSL) was prepared concurrently with this FOST to support a Lease in Furtherance of Conveyance (LIFOC) for the CO areas. The FOSL establishes restrictions that will be imposed on leases of property within the CO areas to allow use of property without impeding the cleanup and to prevent human exposure to potential contaminants while remedial action is being completed (DON 2002).

This FOST, including tables and figures, is based on the final Basewide Environmental Baseline Survey (EBS) Report for MCAS Tustin (BNI 2001) and other referenced documents listed in Attachment 1, References. Other relevant documents include the final MCAS Tustin Business Plan (DON 2001a), which provides schedules of planned environmental activities at the base updated through 31 December 2000. Parcel designations herein match those presented in the EBS Report and are consistent with those presented in the final MCAS Tustin Specific Plan/Reuse Plan Errata (Reuse Plan), except for Parcels 16, 27, and 40 that have been slightly modified (City of Tustin 1998). Ultimate parcel uses in the FOST are designated as one of four categories: Educational/Recreational, Commercial/Business, Residential, or Circulation Facilities. These categories incorporate the more specific parcel uses as designated in the Reuse Plan for Tustin.

This FOST was prepared in accordance with United States Department of Defense (DoD) guidance documents, including DoD Guidance on the Environmental Review Process to Reach a Finding of Suitability to Transfer for Property Where Release or Disposal Has Occurred (DoD 1994a). The MCAS Tustin environmental documents are available in the information repository located within the government document section of the main library of the University of California at Irvine.

## 2.0 PROPERTY DESCRIPTION

MCAS Tustin is located in Southern California near the center of Orange County (Figure 1). The installation is located in a residential and light industrial/manufacturing area approximately 40 miles south of downtown Los Angeles and approximately 100 miles north of the California-Mexico border. It encompasses approximately 1,600 acres of land. Most of the base is located within the city of Tustin; although approximately 95 acres in the southern portion of the base are within the city of Irvine. The transfer parcels in this FOST are located in the city of Tustin. The base is bordered by the cities of Tustin, Irvine, and Santa Ana.

MCAS Tustin was commissioned in 1942 as a United States Department of the Navy (DON) lighter-than-air base. The installation was used to support observation blimps and personnel conducting antisubmarine patrols off the coast of Southern California during World War II. In 1949, the base was officially decommissioned as an active facility because of the diminished need for blimp patrols. However, in 1951 the base was reactivated to support helicopter operations for the Korean War and was renamed "MCAS (Helicopter) Santa Ana." In 1978, the installation name was changed to "MCAS (H) Tustin" to reflect its annexation by the city of Tustin. In 1986, the installation was renamed "MCAS Tustin."

MCAS Tustin was operationally closed on 02 July 1999 in accordance with the Defense Base Closure and Realignment Act of 1990. Currently, the majority of the buildings are unoccupied, and the primary activities at the base are maintenance and environmental cleanup.

The boundaries of this FOST, depicted on Figure 2, enclose Parcels 1, 2, 16, 17, 18, 19, 20, 22, 23, 24, 27, 28, 29, 34, 35, 36, and portions of Parcels 40 and 41. The area of this FOST consists of approximately 940 acres. Of these 940 acres, approximately 315 acres have been carved out of transfer parcels for LIFOC, leaving 625 acres for transfer.

The CO areas are described below and shown on Figure 2 (actual acreages will be determined by a land survey).

- CO-5, approximately 235 acres, includes IRP-9A (NFA), portions of IRP-9B (NFA), IRP-11, IRP-12, IRP-13E (NFA), IRP-13S, IRP-13W, and IRP-16.

- CO-6, approximately 32 acres, includes IRP-3.
- CO-7, approximately 4 acres, includes IRP-5N.
- CO-8, approximately 21 acres, includes Mooring Pads 4 and 5.
- CO-9, approximately 2 acres, includes IRP-5S(a).
- CO-10, approximately 18 acres, includes IRP-1.
- CO-11, approximately 2.5 acres, includes the area affected by above ground storage tank (AST) sites 194A and B.

Parcel descriptions and boundaries included in this FOST are described in Sections 2.1 through 2.13 below. Buildings or structures located within the transfer parcels are shown on Figure 3 and described in Table 1. Figure 4 is a detailed map of the northwestern portion of the transfer area that shows buildings and structures located within Parcel 23 and portions of Parcels 1, 16, 24, and 40. Figure 5 details the buildings and structures in the central transfer area that includes portions of Parcels 16, 17, 24, 27, and 40. Figure 6 shows buildings and structures within the southeastern portion of the transfer area, including Parcels 29, 34, 35, and 36, and portions of Parcels 28, 40, and 41.

Locations of former areas of concern (AOCs) within the transfer parcel boundaries are shown on Figure 7. Descriptions and the regulatory status of the AOCs are presented in Table 2. AOCs are areas investigated for possible contamination due to storage, disposal, or release of hazardous substances or petroleum products.

Locations of underground storage tank (UST) and AST sites formerly located on the transfer parcels are shown on Figure 8. Descriptions and the regulatory status of former AST/UST sites are presented in Table 3.

## **2.1 Parcel 1 (Portions)**

Parcel 1 (Figure 2) consists of approximately 100 acres, divided into three subsections, located in the northwestern portion of MCAS Tustin. The largest of the three subsections is bordered to the northwest by Red Hill Avenue, to the south by portions of Parcel 40, to the east by Parcels 2, 19, and portions of Parcel 40, and to the north by Parcel 3, and portions of Parcel 40. The two smaller subsections are north of the largest subsection. One is bordered to the south and west by portions of Parcel 40, to the east by Parcel 19, and to the north by Parcel 22. The second subsection is located between Parcels 3 and 20, and has a portion of Parcel 40 running through it.

Approximately 29 acres of Parcel 1, including one of the smaller subsections and areas in the eastern portion of the largest subsection, have been carved out for LIFOC as part of CO-5. An additional 2.5 acres of Parcel 1 in the southern

portion of the largest subsection have been carved out for LIFO as part of CO-11 (Figure 2).

Twenty-two AOCs (including one partially located in Parcel 40) (Table 2) and 16 UST/AST sites (Table 3) are located on the transfer portion of Parcel 1.

Regulatory concurrence for NFA has been received for twenty-one of the AOCs on Parcel 1 (Table 2). The remaining AOC was removed from consideration by the BRAC Cleanup Team (BCT). All the UST/AST sites have received regulatory concurrence for NFA (Table 3). Three groundwater monitoring wells are located within the transfer boundaries of this parcel (Table 8).

Twenty-one buildings (including one partially located on Parcel 40) and seven structures (Table 1) are located within the boundaries of the transfer portion of Parcel 1 (Figures 3 and 4). Two buildings (134 and 539) are partially located within the transfer boundaries and have been included in CO-5. Fourteen buildings and five structures are scheduled for reuse and six buildings are slated for demolition after transfer. Ultimate disposition of the remaining building and two structures have not been determined.

Parcel 1 is anticipated to be transferred for educational/recreational use.

## **2.2 Parcel 16 (Portions)**

Parcel 16 (Figure 2) consists of approximately 185 acres and is located in the central portion of MCAS Tustin. The parcel is bordered by Parcels 17 and 18 to the north and northeast, and by portions of Parcel 40 to the east and south. Parcel 27 lies to the east.

Approximately 75 acres from areas in the northern (CO-5), southern (CO-6), and eastern (CO-7 and CO-8) portions of Parcel 16 have been carved out for LIFO as part of CO-11 (Figure 2).

Eight AOCs, which have all received regulatory concurrence for NFA, are located on the transfer portion of Parcel 16 (Table 2). No UST/AST sites are located in the transfer portions of Parcel 16.

Five buildings (including one partially located on Parcel 40) and four structures are located in the transfer portion of Parcel 16 (Figures 3 and 5). The five buildings and three structures are slated for demolition and the remaining structure is scheduled for reuse (Table 1).

Parcel 16 is anticipated to be transferred for commercial/business use.

## **2.3 Parcel 17 (Portions)**

Parcel 17 (Figure 2) consists of approximately 40 acres located in the northeastern central area of MCAS Tustin and is bordered by Parcel 18 to the northwest, Parcel 16 to the south and southwest, and portions of Parcel 40 to the southeast

and northeast. Parcels 24 and 25 also lie to the northeast and Parcel 27 lies to the southeast.

An area approximately 2 acres in size in the western corner of Parcel 17 (CO-5) has been carved out for LIFO (Figure 2).

No buildings, AOCs, or UST/AST sites are located in the transfer portions of Parcel 17.

Parcel 17 is anticipated to be transferred for educational/recreational use.

## **2.4 Parcel 23**

Parcel 23 (Figure 2) consists of approximately 54 acres located in the northern portion of MCAS Tustin. Parcel 23 is bordered by city of Tustin boundaries to the north, by Parcel 24 to the east and south, and by portions of Parcel 40 to the west.

Three AOC sites are located in the transfer portions of Parcel 23. Two have received regulatory concurrence for NFA, and one has been removed from consideration by the BCT (Table 2). No UST/AST sites are located in the transfer portions of Parcel 23.

Parcel 23 is a former residential area that currently consists of 91 multi-plex residential buildings (Tustin Villas Housing), one structure, and one building (partially located on Parcel 40) (Table 1). The building, structure, and residential buildings are scheduled for demolition after transfer.

Parcel 23 is anticipated to be transferred for residential use.

## **2.5 Parcel 24 (Portions)**

Parcel 24 (Figure 2) consists of approximately 50 acres located in the northern portion of MCAS Tustin. Parcel 24 is bordered by Parcel 23 to the north and by portions of Parcel 40 to the east, south, and west. Parcels 17 and 18 are situated to the south of Parcel 24.

The western half of Parcel 24 (CO-5), consisting of approximately 25 acres, has been carved out for LIFO (Figure 2).

No buildings/structures, AOCs, or UST/AST sites are located in the transfer portions of Parcel 24.

Parcel 24 is anticipated to be transferred for residential use.

## **2.6 Parcel 27 (Portions)**

Parcel 27 (Figure 2) consists of approximately 78 acres located in the central portion of MCAS Tustin and is encompassed by portions of Parcel 40. Parcels 28

and 32 are situated to the east, Parcel 29 to the southeast, Parcels 30, 31, and 12 to the south, Parcel 16 to the west, and Parcels 17, 25, and 26 to the north.

Approximately 17 acres in the southwestern portion of Parcel 27 have been carved out for LIFO as part of CO-8. One additional acre in the southern portion of Parcel 27 has been carved out for LIFO as part of CO-9 (Figure 2).

Two AOCs (including one partially located in Parcel 40) are located within the transfer portion of Parcel 27. These AOCs have received regulatory approval for NFA (Table 2). No UST/AST sites are located on the transfer portions of Parcel 27. Three groundwater monitoring wells and one surface water gauging location are located within the transfer boundaries of this parcel (Table 8).

One structure, scheduled to be demolished, is located in the transfer portion of Parcel 27.

Parcel 27 is anticipated to be transferred for residential use (Table 1).

## **2.7 Parcel 28 (Portions)**

Parcel 28 (Figure 2) consists of approximately 58 acres located in the eastern portion of MCAS Tustin and is bordered by portions of Parcel 40 to the north, portions of Parcel 41 to the east, portions of Parcel 40 to the south, and portions of Parcel 40 to the west. Parcels 26 and 32 are situated to the north, Parcel 34 to the east, Parcel 29 to the south, and Parcel 27 to the west.

One acre on the southeastern edge of Parcel 28 (CO-10) has been carved out for LIFO (Figure 2).

Two AOCs (Figure 7) and two ASTs (Figure 8) are located in the transfer portion of Parcel 28. All have received regulatory concurrence for NFA (Tables 2 and 3). Four groundwater monitoring wells are located within the transfer boundaries of this parcel (Table 8). Land use restrictions and access pertaining to these groundwater monitoring wells are covered in a Covenant to Restrict Use of Property and the Deed transferring Parcel 28 per the Record of Decision (ROD) for Operable Unit (OU)-3.

Three buildings (Table 1) are located within the transfer boundaries of Parcel 28 (Figures 3 and 6) and are all scheduled for demolition.

Parcel 28 is anticipated to be transferred for residential use.

## **2.8 Parcel 29**

Parcel 29 (Figure 2) consists of approximately 55 acres located in the southeastern portion of MCAS Tustin. Parcel 29 is bordered by Parcels 30 and 31 to the west and by portions of Parcel 40 to the north, east, and south. Parcels 27 and 28 are situated to the north and Parcels 34, 35, and 36 to the east and south.

Six AOCs are located within the boundaries of Parcel 29 (Figure 7). Regulatory concurrence for NFA has been received for all of the AOCs (Table 2). One former UST site is located on Parcel 29 (Figure 8). Regulatory concurrence for NFA has been received for this UST site (Table 3). One groundwater monitoring well is partially located within the transfer boundaries of this parcel (Table 8).

Four buildings and two structures, all slated for demolition after transfer (Table 1), are located within the boundaries of Parcel 29 (Figures 3 and 6).

Parcel 29 is anticipated to be transferred for residential use.

## **2.9 Parcel 34**

Parcel 34 (Figure 2) consists of approximately 36 acres located in the southeastern portion of MCAS Tustin and is bordered by city of Tustin boundaries to the east and northeast, portions of Parcel 40 to the south, and portions of Parcel 41 to the northwest. Parcel 35 is situated to the south and Parcels 28 and 29 are situated to the west and northwest of Parcel 34.

One AOC is located within Parcel 34 (Figure 7). Regulatory concurrence of NFA for this AOC has been received (Table 2). No UST/AST sites are located in Parcel 34.

Five structures (including one partially located on Parcel 40) (Table 1) and 77 multi-plex residential buildings (Irvine Park North Housing) are located on Parcel 34 (Figures 3 and 6). The residential buildings are scheduled for demolition after transfer. The ultimate disposition (demolition or reuse) of the structures is still to be determined.

Parcel 34 is anticipated to be transferred for residential use.

## **2.10 Parcel 35**

Parcel 35 (Figure 2) consists of approximately 64 acres located in the eastern portion of MCAS Tustin and is bordered by Parcel 36 to the south, by city of Tustin boundaries to the southeast, by portions of Parcel 40 to the northeast, and portions of Parcel 41 to the west and northwest. Parcel 34 is situated to the northeast and Parcels 28 and 29 are located west and northwest.

One AOC is located within Parcel 35 (Figure 7) and it has received regulatory concurrence for NFA (Table 2). No UST/AST sites are located on Parcel 35.

One building, four structures and 121 multi-plex residential buildings (67 in Moffett Meadows Housing and 54 in Irvine Park South Housing) are located on Parcel 35 (Table 1, Figures 3 and 6). The residential buildings are scheduled for demolition after transfer and the ultimate disposition of the building and structures is to be determined.

Parcel 35 is anticipated to be transferred for residential use.

## **2.11 Parcel 36**

Parcel 36 (Figure 2) consists of approximately 22 acres located in the eastern portion of MCAS Tustin and is bordered by city of Tustin boundaries to the east, west and south, and by Parcel 35 to the north.

No AOCs or UST/AST sites are located on the parcel.

Parcel 36 is a former residential area and contains 25 multi-plex residential buildings (Irvine Park South Housing) that are scheduled for demolition after transfer.

Parcel 36 is anticipated to be transferred for residential use (Table 1).

## **2.12 Parcel 40 (Portions)**

The portions of Parcel 40 within the FOST boundaries consist of approximately 50 acres of proposed circulation facilities (e.g., roadways and intersections) (Figure 2).

Some areas of Parcel 40 have been carved out (CO-5, CO-7, CO-8, CO-9 and CO-10) for LIFOC (Figure 2), leaving 24 acres available for transfer.

Two AOCs (one partially located in Parcel 27) that have received regulatory approval for NFA are located in the transfer portion of Parcel 40 (Table 2). No UST/AST sites are located in the transfer portion of Parcel 40. One groundwater monitoring well is partially located within the transfer boundaries of this parcel (Table 8).

Four buildings scheduled for demolition (including one partially located on Parcel 1, one partially located on Parcel 16, and one partially located on Parcel 23) are located within the transfer boundaries of Parcel 40. One structure, partially located in Parcel 34, with an ultimate disposition yet to be determined, is also located within the transfer boundaries of Parcel 40 (Table 1).

These portions of Parcel 40 are anticipated to be transferred for circulation facilities.

## **2.13 Parcel 41 (Portions)**

The portions of Parcel 41 within the FOST boundaries consist of drainage facilities and include approximately 20 acres (Figure 2).

A portion of the northeastern area of Parcel 41 (CO-10) has been carved out for LIFOC (Figure 2), leaving 12 acres available for transfer.

No buildings/structures, AOCs, or UST/AST sites are located in this parcel. One surface water gauging location is located within the transfer boundaries of this parcel (Table 8).

These portions of Parcel 41 are anticipated to be transferred for drainage facilities.

### **3.0 REGULATORY COORDINATION**

The environmental restoration and compliance programs at MCAS Tustin have been derived from and are being implemented pursuant to the following regulatory mechanisms:

- CERCLA, as amended by the Superfund Amendments and Reauthorization Act and the Community Environmental Response Facilitation Act
- Resource Conservation and Recovery Act (RCRA)
- National Environmental Policy Act (NEPA)
- California Environmental Quality Act (CEQA)
- Petroleum Corrective Action Program
- California Health and Safety Code

MCAS Tustin is not a Superfund site and is not listed on the National Priorities List. A Federal Facility Site Remediation Agreement (FFSRA) between DON and the California Environmental Protection Agency (Cal-EPA) Department of Toxic Substances Control (DTSC) was signed for MCAS Tustin on 18 August 1999. The FFSRA defines DON's corrective action and response action obligations under RCRA and CERCLA.

Since 1993, the BCT has coordinated cleanup and closure activities at MCAS Tustin. The BCT consists of representatives from DON, the United States Environmental Protection Agency (U.S. EPA), the Santa Ana Regional Water Quality Control Board, and DTSC. These agencies reviewed and commented on the required documents included in Attachment 1.

DON is the lead federal agency regarding environmental restoration at MCAS Tustin. DTSC is the lead regulatory agency providing oversight.

### **4.0 NATIONAL ENVIRONMENTAL POLICY ACT COMPLIANCE**

Potential environmental impacts pertaining to the disposal and reuse of MCAS Tustin were addressed in the final Environmental Impact Statement (EIS)/Environmental Impact Report (EIR) (DON 1999) and were disclosed to agencies and the public for comment and review in compliance with the requirements of NEPA and CEQA. The EIS/EIR was prepared through the joint effort of DON (EIS) and the City of Tustin (EIR). DON prepared a NEPA ROD to document the selected proposed alternative for reuse of each of the parcels

discussed in the EIS/EIR. The NEPA ROD was published on 02 March 2001 (DON 2001b).

## **5.0 ENVIRONMENTAL BASELINE SURVEY HISTORY AND FINDINGS**

Two EBS Reports have been prepared for MCAS Tustin describing environmental investigation and closure activities at the base to support reuse. In April 1997, a site-specific EBS Report was issued for Parcels 6, 8B, 8C, 11A, 33, 38, 39, 41A, and 41B (BNI 1997a). This EBS Report described the environmental condition of the parcels and associated rights-of-way scheduled for transfer with respect to the presence of hazardous substances and petroleum products. Since this report was issued, some of the parcel numbers have been changed.

In 2001 a final Basewide EBS Report was prepared for MCAS Tustin describing environmental investigation and closure activities at the base to support reuse (BNI 2001). The Basewide EBS Report summarizes environmental conditions at the facility and includes information concerning IRP sites, AOCs, USTs, and ASTs. Information concerning asbestos-containing material (ACM), polychlorinated biphenyls (PCBs), and lead-based paint (LBP) surveys conducted at the facility is also included in the Basewide EBS Report.

The BRAC Cleanup Plan Guidebook (DoD 1996) provides the BCT with direction to classify base property into one of seven area types in order to facilitate and support reuse and transfer. Descriptions of the seven area types are provided in Table 4. The area types are ranked in order of their suitability for transfer. Area types 1 through 4 are considered suitable for transfer by deed. Area types 5 and 6 are considered unsuitable for transfer by deed until all remedial actions have been completed or after the remedy has been demonstrated to be operating properly and successfully. Areas classified as area type 7 either have not been evaluated or require further evaluation in order to classify them into one of the other area types.

Thirteen IRP sites identified in the final Basewide EBS Report, are located within the CO areas of Parcels 1, 16, 17, 24, 27, 28, 40 and 41. IRP Sites 3, 5N, 5S(a), 11, 12, and 13S are classified as Area Type 6. IRP Sites 1, 13W, and 16 are classified as Area Type 5. IRP Sites 2, 9A, 9B, and 13E have received regulatory concurrence for NFA and are classified as Area Type 4. The IRP sites are addressed in the following OUs:

- OU-1A consists of IRP Site 13S, where a Time-Critical Removal Action is being conducted.
- OU-1B includes IRP-3 and IRP-12, where possible alternatives for the remediation of groundwater contamination are being evaluated and finalized.

- OU-2 received final closure for IRP-2, IRP-9A, IRP-9B, and IRP-13E with the signing of the OU-2 NFA ROD/Remedial Action Plan (RAP) in September 2000 (Attachment 2).
- OU-3 consists of IRP-1 that includes areas of soil and groundwater contamination. The OU-3 ROD was signed in December 2001 and the remedy (containment with institutional controls) is in place.
- OU-4 consists of IRP sites 5S(a), 5N, 11, 13W, and 16 that are currently being evaluated in a focused feasibility study (FS).

A methyl tertiary-butyl ether (MTBE) groundwater plume, originating from UST Site 222, is also located within a CO area of the transfer parcels. Characterization of the MTBE plume is ongoing and corrective actions are being implemented at the site.

Since investigations and studies are ongoing at nine IRP sites, they are not included in this FOST. The CO areas include buffer zones to allow for protection of human health while further investigation and studies are conducted. The nine active IRP sites will be leased in furtherance of conveyance pending completion of the investigations and determination that the property within the CO areas is suitable for transfer. A detailed description of the nine IRP sites is provided in the FOSL document prepared concurrently with this document (DON 2002).

Figure 12 shows areas of contamination associated with each parcel. Figure 12 does not show contamination associated with each individual AOC, UST, or AST.

## 6.0 ENVIRONMENTAL FINDINGS

AOCs and former UST/AST sites have been identified within the 13 parcels (or portions of parcels) being conveyed in this FOST (excluding the CO areas). Figures 7 and 8, respectively, show the locations of AOCs and former UST/AST sites within the transfer parcels. Description and site status information for each AOC and UST/AST site are provided in Tables 2 and 3, respectively.

All of the AOCs have been assigned Area Types 1 through 4 (Table 2). All of the UST/AST sites have been assigned Area Type 1 or 2 (Table 3). Signature pages from the concurring regulatory agencies for all of the AOCs and UST/AST sites are included in Attachment 2. IRP sites, AOCs, USTs, and ASTs within the CO areas of the transfer parcels were evaluated in conjunction with this FOST. Based on this evaluation, it was concluded that contamination (e.g., groundwater plumes) from the CO areas does not affect the transfer parcels.

Environmental factors considered for the 13 parcels discussed in this FOST are listed in Table 5. Only those factors that require notification or restriction are discussed in this document.

## 7.0 ENVIRONMENTAL FINDINGS IN CO AREAS

This section discusses the nine active IRP sites within the CO areas that have ongoing investigations (Figure 9). These sites, their buffer zones, various AOCs, USTs, ASTs, and other areas under evaluation have been carved out of the parcels described in this FOST because of the presence of soil and/or groundwater contamination, and associated ongoing investigations. The CO areas cover approximately 315 acres. They establish buffer zones where lease restrictions can be imposed to prevent human exposure to potential contaminants while remedial action is being evaluated. These areas will be included in LIFOCS. A separate FOSL will be issued to support the LIFOCS. IRP Sites 1, 3, 5N, 5S(a), 11, 12, 13S, 13W, and 16, various AOCs, USTs, ASTs, and other areas under evaluation will be discussed in greater detail in the FOSL.

IRP-1, Moffett Trenches and Crash Crew Burn Pits (Figure 9), located within Parcel 40, and portions of Parcels 28 and 41, consists of shallow landfill trenches and pits constructed to burn flammable liquids for fire-fighter training exercises. A mixture of MCAS Tustin-generated municipal solid and industrial waste was disposed in the landfill trenches. Flammable liquids burned in the Crash Crew Burn Pits consisted primarily of jet propellant grade 5 and reportedly included oils, fuels, solvents, lacquers, primers, and various chemicals (BNI 1996a). IRP-1 has been extensively investigated since 1983 and a number of response actions have occurred at IRP-1 on the basis of the investigation findings. Landfill gas and groundwater monitoring at IRP-1 is ongoing. The ROD/ RAP was completed in December 2001 and the Operations and Maintenance Plan is scheduled to be completed in 2002.

IRP-3, the Paint Stripper Disposal Area, is located in the southern portion of Parcel 16 (Figure 9). It contains several buildings that have been used for chemical storage, painting, paint-stripping operations, and reportedly waste disposal. Sources of trichloroethene (TCE) may have been due to inactive oil/water separators and past disposal or spills onto the ground. TCE was found in both soil and groundwater at IRP-3. An approximately 1200- by 600-foot volatile organic compound (VOC) plume has been identified in the first water-bearing zone beneath IRP-3, and a smaller VOC plume has been identified in the second water-bearing zone. The plumes consist primarily of dissolved TCE with minor amounts of other chlorinated VOCs at concentrations that exceed drinking water maximum contaminant levels (MCLs). Possible alternatives for the remediation of groundwater contamination were presented in the January 2002 FS for OU-1B, and the Proposed Plan is scheduled to be finalized in April 2002.

IRP sites 5N and 5S(a) are two unlined drainage ditches in Drainage Area No. 1, located in the eastern portion of Parcel 16 and the southern portion of Parcel 27, respectively (Figure 9). From 1956 to 1983, the ditches may have received a variety of wastes disposed in floor drains from Buildings 28 and 29 as well as

runoff from other potential contaminant source areas. Analytical results from sediment, soil, and surface water sampling indicated the presence of petroleum hydrocarbons, semivolatile organic compounds, and metals at levels above background in some of the sediment samples. Additionally, one groundwater sample collected at Site-5N had a concentration of TCE at the drinking water maximum contaminant level. The draft final Remedial Investigation (RI) Report for OU-1 and OU-2 (BNI 1997b) evaluated IRP-5 under a recreational-use scenario and recommended NFA at this site. However, DON determined that IRP-5 should be further evaluated in a focused FS as part of OU-4 because the property may be used for future residential use. The focused FS for OU-4 is currently in progress and will include a residential-use human-health risk assessment.

IRP-11, Drum Storage Area No. 1, was used for drum storage from 1975 to 1984, located in the northeastern portion of Parcel 18 (Figure 9). Drums were reportedly stored on bare soil prior to paving of the site in 1984. Materials stored included hydraulic fluids, crankcase oils, solvents, and aviation parts. The site was investigated and soil was subsequently recommended for NFA (BNI 2001). Remedial alternatives for TCE-impacted groundwater cleanup are being evaluated in the OU-4 focused FS report that is scheduled for completion in 2003.

IRP-12, Drum Storage Area No. 2, operated from the mid-1960s until 1975, located in the eastern portion of Parcel 18 (Figure 9). IRP-12 contains three subareas where various solvents, crankcase oil, and hydraulic fluids leaked from storage drums and containers. TCE was found in both soil and groundwater (BNI 1997b). Two VOC plumes have been identified in the first water-bearing zone, and one smaller VOC plume has been identified in the second water-bearing zone. The plumes consist primarily of dissolved TCE with minor amounts of other chlorinated VOCs (BNI 2001). Seven remedial alternatives were evaluated in the January 2002 OU-1B FS Report. The Proposed Plan is scheduled for completion in April 2002.

IRP-13S is one of three parts of Drum Storage Area No. 3, located on northern portions of Parcel 40 (Figure 9). IRP-13S includes two AOCs, an inactive wash area formerly used for cleaning small generators, and an inactive vehicle maintenance facility that formerly consisted of a garage and a lubrication facility. During the RI, TCE and 1,2,3-trichloropropane (1,2,3-TCP) were found in both soil and groundwater at IRP-13S. The likely sources were identified as past disposal or spills. The groundwater plume beneath IRP-13S was also found to be significantly impacted by MTBE groundwater contamination originating from UST Site 222 (BNI 2001). A Time-Critical Removal Action is being conducted to treat the TCE and 1,2,3-TCP plume, and the FS is currently being prepared. The draft FS is scheduled to be issued in September 2002.

IRP-13W (Figure 9) consists of two past disposal areas located in the northwestern portion of Parcel 24. Hydraulic fluid, diesel fuel, leaded gasoline, oil, paint strippers, battery acids, solvents and solvent-contaminated washwater were reportedly disposed onto IRP-13W soils. Petroleum hydrocarbons, selected metals, and polynuclear aromatic hydrocarbons were found in soil and TCE was found in soil and groundwater. A soil removal action was recommended, and approximately 3,700 tons of soil were removed in November 1997 (BNI 2001). Remedial alternatives for contaminated groundwater are being evaluated in the OU-4 focused FS report that is scheduled for completion in 2003.

IRP-16 (Figure 9) is located in the center of Parcel 24. IRP-16 was the subject of a confirmation study in 1987 and 1988 and a fuel farm site assessment in 1993. Based on the investigation findings, two separate excavation and restoration activities were conducted in 1995 and 1996. Approximately 85,000 tons of contaminated soils were excavated and treated, and 5 million gallons of groundwater were recovered and treated. DON recommended further groundwater evaluation. Remedial alternatives for contaminated groundwater are being evaluated in the OU-4 focused FS scheduled for completion in 2003.

## **8.0 USE RESTRICTIONS AND NOTIFICATIONS**

The documents listed in Attachment 1 (References) were evaluated to identify environmental factors that may have impacted the FOST sites included herein. The evaluation identified existing environmental conditions that may warrant restrictions on certain activities to assure that post-transfer use of the FOST parcels is protective of human health and the environment. Additional environmental factors associated with parcels being transferred for ultimate use as a school site were considered. Environmental factors that require notification(s) and/or restriction(s) are discussed below and summarized in Table 9. See Table 5 for a list of environmental factors considered.

Pursuant to CERCLA Section 120(h)(3)(A)(i) and provisions of 40 Code of Federal Regulations Part 373, the deed will contain a notice of hazardous substances stored, released, or disposed within the transfer parcels at MCAS Tustin. This notice is provided in Attachment 3 - Hazardous Substances Notification Table and Petroleum Products Notification Table. The Petroleum Products Notification Table lists the UST/AST and AOC sites (containing petroleum products), which are within the scope of the CERCLA Petroleum Exclusion set forth in CERCLA Section 101(14).

Attachment 5 provides comments from regulatory agencies and other interested parties with DON's corresponding responses. Attachment 5 also contains DTSC's 22 April 2002 letter stating their final position on this FOST. Unresolved comments are provided in Attachment 6, per FOST policy in the DoD Base Reuse Implementation Manual.

All the following restrictions listed in this section will be incorporated into the deed(s).

## **8.1 Notification - Pesticides**

Agricultural areas are located on Parcels 17, 24, 27, 28, 29, and 40. Portions of Parcels 17, 24, 27, 28, and 40 are contained in CO-5, CO-8, and CO-10. The following summarizes notifications that are required based on previous use of pesticides and herbicides at these parcels.

Approximately 674 acres of MCAS Tustin were previously designated for agricultural land or were maintained for weed control, of which about 392 acres were farmed (BNI 2001). Farming was conducted within the base boundary prior to commissioning of the base in 1942 and continued through December 2000. The primary agricultural areas are located in the southwestern and northeastern portions of the base. The former lessee, Osumi Farms, submitted monthly pesticide use reports to Cal-EPA, Department of Pesticide Regulation, regarding pesticide use on parcels under cultivation. Information concerning commercial pesticides and insecticides used at MCAS Tustin and chemicals injected into irrigation water is provided in the final EBS Report (BNI 2001).

In 1991 and 1992, a preliminary endangerment assessment (PEA) was conducted for Parcel 24 (PEA Parcel A), Parcels 38 and 39 (PEA Parcel C), and Parcel 33 (PEA Parcel D). These parcels were farmed before 1942 and were used for a combination of military and agricultural purposes after being acquired by DON in 1942. The PEA included soil and groundwater sampling and a health risk assessment for soil contaminant concentrations exceeding screening values. These contaminants included the pesticides dichlorodiphenyltrichloroethane (DDT), dichlorodiphenyldichloroethene (DDE), and dichlorodiphenyldichloroethane (DDD). The risk assessment assumed residential land use and exposure to adults and children by soil ingestion, soil contact, and inhalation of soil particles. Although soil contaminant levels exceeded some screening values, the risk assessment results indicated, on the basis of a residential-use scenario, that there was no significant environmental or human-health threat from the pesticides (GeoRemediation 1992). DTSC provided NFA concurrence on the findings in the PEA for the areas containing Parcels 24, 33, 38, and 39. DTSC's 26 May 1992 NFA concurrence letter for Parcel A and 27 May 1992 NFA concurrence letters for Parcels C and D are provided in Attachment 2.

Additionally, groundwater sample results presented in the draft final RI Report for OU-1 and OU-2 (BNI 1997b) did not indicate the presence of pesticides in groundwater beneath Parcel 24. While selenium was detected in groundwater during the RI at concentrations exceeding the PEA screening levels, an analysis of background metals in groundwater performed during the RI indicated that

detected concentrations of selenium in groundwater were not the result of base operations, but consistent with naturally occurring background concentrations.

Further investigation in 1996 supported the PEA findings. Soil samples were collected from the southwest corner (Parcel 6) and the northeast quadrant (Parcels 17, 25, 26, 27, 28, 29, 30, 31, 32, and 40) of MCAS Tustin to evaluate whether residual pesticides and metals were present in soil as a result of past agricultural activities at MCAS Tustin (BNI 1996b). This study included some or all of Parcels 17, 27, 28, 29, and 40. The pesticides DDD, DDE, DDT, alpha-chlordane, dieldrin, endosulfan II, gamma-chlordane, and methoxychlor were detected in soil samples. Pesticide concentrations were compared with those reported in soil collected from Parcels 38 and 39 (PEA Parcel C) (considered to be representative worst-case scenarios). The results of the comparison indicated that pesticide concentrations in Parcels 17, 27, 28, 29, and 40 were at levels below or within the statistical range calculated for Parcels 38 and 39. Therefore, it was concluded that residual levels of pesticides in soil in Parcels 17, 27, 28, 29, and 40 do not constitute a threat to human health or the environment.

Additionally, 11 metals were detected at concentrations above background values and some pesticides (DDD, DDE, and DDT) were detected that were not found during the Parcels 38 and 39 investigation. Therefore, a screening risk assessment using the highest measured concentrations and U.S. EPA residential soil preliminary remediation goals was conducted. The risk assessment used the conservative approximation that people would be present on the land 24 hours a day for 30 years. The screening risk assessment results for metals and pesticides indicated no significant risk to human health or the environment (BNI 1996b). The 1996 Pesticides Investigation Report was reviewed by the BCT whose comments were incorporated (see 15 July 1996 letter in Attachment 2).

At the time of transfer, DON will provide the transferee with documentation regarding past pesticide use on the property as well as a copy of the PEA Report and the Pesticide Investigation Report. Although pesticides were reportedly applied to some or all of Parcels 17, 24, 27, 28, 29, and 40, the PEA sampling and risk assessment and the pesticide investigation conducted in 1996 indicated that the property was suitable for unrestricted, residential use.

## **8.2 Notification – Polychlorinated Biphenyls**

An inventory of PCB items and equipment at MCAS Tustin was conducted in 1992 (Kennedy/Jenks Consultants 1992). One item (small capacitor) at Building 218 (located on Parcel 1) was found to potentially contain PCBs (Table 6). Small capacitors may contain PCB-impregnated solid insulation. Corrective action was not conducted because observation and/or sampling were not possible without dismantling the motor and destroying the capacitor. If the transferee plans to dispose of equipment containing more than 50 parts per million (ppm), the PCB

small capacitors in those motors should be processed as regulated items. PCB-containing equipment may also be subject to State hazardous waste laws regulating PCB waste.

Fluorescent light fixtures were not included in the PCB items and equipment survey. Because some of the buildings on Parcels 1, 16, 23, 27, 28, 29, 35, and 40 were built before 1979, some light ballasts in the buildings may contain PCBs. Fluorescent light ballasts manufactured before 1979 often contain PCBs in small capacitors that may be disposed as municipal solid waste. No remedial action is required at the buildings unless large quantities of PCB-containing fluorescent light ballasts are removed. According to DON guidance on disposal of fluorescent light ballasts containing PCBs (DON 1989), large quantities of PCB small capacitors generated from fluorescent light ballasts, such as when the fixtures in a large office or an entire building are replaced, should be disposed by the transferee as regulated PCB equipment.

Fluorescent light ballasts that contain PCBs have approximately 1.0 to 1.5 ounces of PCB fluid in each capacitor. There are approximately 3.1 to 4.7 pounds of PCB fluid for every 50 PCB small capacitors in fluorescent light ballasts. If the transferee plans to dispose fluorescent light ballasts or any other equipment containing more than 3 pounds of PCB fluids, they should be processed by the transferee as regulated items.

In 1996, a PCB transformer survey was conducted at MCAS Tustin (PWC 1996). Per DON policy, transformers containing PCBs at concentrations exceeding 50 ppm were replaced. Transformers with PCB concentrations of less than 50 ppm are classified by federal standards (40 Code of Federal Regulations 761.3) as non-PCB transformers. PCB-containing equipment may also be subject to State hazardous waste laws regulating PCB waste. Transformers tested for PCBs during this study that are currently located within the boundaries of the transfer parcels all contained PCBs at concentrations equal to or less than 32 ppm. No additional action concerning transformers is required by DON before transfer.

### **8.3 Notification - Radon**

DoD policy (included in Attachment 4) is to disclose available and relevant radon assessment data pertaining to BRAC property being leased or transferred for inclusion in property lease/transfer documents. However, there is currently no federal requirement to perform follow-on radon assessment or mitigation in federal buildings, including those to be transferred to the public or private sector (DoD 1994b).

Though not required by regulatory agencies, DON conducted a radon survey at the housing areas of MCAS Tustin in 1991. Radon screening results were based upon a representative sampling of residential buildings in Parcels 23, 34, 35, and 36. The results of the radon survey indicated that none of the residential

buildings contained levels of radon above 4 picocuries per liter (pCi/L). According to U.S. EPA guidance, radon at levels of 4 pCi/L or less are considered "low risk," and no mitigation is required (DON 1991). Additional radon testing or mitigation, therefore, was not required.

#### **8.4 Notification - Wetlands**

Parts of Parcels 1, 27, 28, 40 and 41 have been designated as jurisdictional waters (wetlands) of the United States under Section 404 of the Clean Water Act. Within those jurisdictional waters, parts of Parcels 1, 40 and 41 were determined to be vegetated or seasonal wetlands (BNI 2001). The United States Army Corps of Engineers exerts jurisdiction over "waters of the U.S.," which include territorial seas, tidal waters, and nontidal waters. The wetlands in Parcels 1, 40, and 41 support cattail and other common marsh plants. The water source appears to be drainage from urban and agricultural runoff from both on-site and off-site sources. Development by the transferee in wetland areas will require Section 404 permits (DON 1999).

#### **8.5 Notification - Prime/Unique Farmland**

Parcels 16, 17, 24, 27, 28, 29, and 40 contain prime farmland. According to the final MCAS Tustin EIS/EIR, no mitigation measures are required (DON 1999).

#### **8.6 Notifications And Restrictions - Asbestos-Containing Material**

DoD policy with regard to asbestos-containing material is to manage ACM in a manner protective of human health and the environment, and to comply with all applicable federal, state, and local laws and regulations governing ACM hazards (DOD 1994b). Therefore, unless it is determined by competent authority that the ACM in the property poses a threat to human health at the time of transfer, all property containing ACM will be conveyed, leased or otherwise conveyed "as is" through the BRAC process. ACM is considered to be a threat to human health if it is located within the interior of a building/structure, and is friable, accessible and damaged (FAD).

Prior to property disposal, all available information on the existence, extent, and condition of ACM shall be provided via the EBS report or other appropriate document to be provided to the transferee. The survey report or document will include:

- Reasonably available information on the type, location, and condition of asbestos in any building/structure or improvement on the property;
- Available results of testing for asbestos, including results of a site-specific FAD ACM survey performed to revalidate the condition of the ACM;
- A description of asbestos control measures taken for the property; and

- Available information on costs or time necessary to remove remaining ACM; however, special studies or tests to obtain this information will not be provided by DON.

DON is required to conduct a FAD ACM survey only when the reuse plan calls for a building/structure to be reused or occupied, rather than demolished. Furthermore, a FAD ACM survey is not required if ACM has never been identified in the interior of a building/structure during previous asbestos surveys, or if an asbestos survey conducted after 1996 found no damaged ACM and there is no reason to suspect that damaged ACM is present. The 1996 date was established to be consistent with the Asbestos Hazard Emergency Response Act (AHERA), which calls for a re-inspection to assess the physical condition (i.e., good or damaged) of ACM at least once every three years. Since base closure occurred in 1999, qualified inspections performed in 1997 or later in buildings that have been vacant since closure are considered to be in compliance with this act.

ACM shall be remediated prior to property disposal only if it is of a type and condition that is not in compliance with applicable laws, regulations, and standards, or if it poses a threat to human health at the time of transfer of the property (i.e., FAD ACM). This remediation shall be accomplished by DON or by the transferee under a negotiated requirement of the property transfer. Use of buildings/structures with FAD ACM will be restricted until abatement has been completed.

When the buildings/structures are scheduled for demolition by the transferee; the transfer document shall prohibit occupation of the buildings/structures prior to demolition. The transferee shall assume responsibility for the management of any ACM, including surveys, removal and/or management of ACM prior to or during demolition, in accordance with applicable laws. Buildings/structures that are to be demolished may be occupied on an interim basis only if the transferee conducts the necessary ACM surveys and abatement according to all local, state, and federal requirements.

DoD policy with respect to ACM is contained in Attachment 4 and a graphic representation of this policy and the decision-making process is presented as Figure 11.

The following sections summarize specific notifications and restrictions regarding the presence of ACM in some of the buildings/structures located within the transfer parcels.

### **8.6.1 Notifications – Asbestos-Containing Material**

ACM has been identified in buildings/structures located on Parcels 1, 16, 29, 34, 35, and 36. Five ACM surveys conducted at MCAS Tustin included buildings/structures in the transfer parcels. The survey results were presented

in reports dated December 1988, December 1991, December 1995, April 1997, and December 2001 (IT Corporation 1988; Ecology and Environment, Inc. 1991; PWC 1995a,b,c,d,e; HLA 1997; and URS 2001; respectively). The 2001 survey was limited to FAD ACM. Results from the ACM surveys are summarized in Table 7. To assure full disclosure of all known ACM on the FOST parcels, copies of the ACM survey reports will be included in the transfer documentation.

#### **8.6.1.1                    Buildings/Structures Planned For Demolition Or "To Be Determined (TBD)"**

*Building 5* was built in 1943 and is located in Parcel 1. The 1988 asbestos survey reported ACM in the building and the 2001 asbestos surveys reported FAD ACM. See Table 7 for a description.

*Structures 10M and 236* are located on Parcel 1 and were built in 1943 and 1973, respectively. These structures have never been surveyed for asbestos.

*Structures 10P and 39* were built in 1943 and are located on Parcel 29 and 27, respectively. These structures have never been surveyed for asbestos.

*Buildings 23A, 23B, 23C, 23D, 23E, and 23F* were built in 1942 and are located in Parcels 28 and 29. The 1991 asbestos survey reported only exterior non-friable ACM (roofing) at Buildings 23D and 23F.

*Building 162* was built 1965 and is located in Parcels 23 and 40. This structure has never been surveyed for asbestos.

*Building 172* was built in 1966 and is located in Parcel 1. The 1991 asbestos survey reported interior and exterior non-friable ACM.

*Building 182* was built in 1967 and is located on Parcels 16 and 40. The 1991 asbestos survey reported only exterior non-friable ACM (roofing).

*Structure 215* is a playground built in 1966 and is located on Parcel 35. No asbestos survey has been conducted at this area.

*Building 254* was built in 1984 and is located on Parcel 1. This building has never been surveyed for asbestos.

*Building 516* was built in 1986 and is located in Parcels 1 and 40. This building has never been surveyed for asbestos.

*Buildings 573 and 574* were built in 1991 and are located on Parcel 1. These buildings have never been surveyed for asbestos.

*Building 562 and Structure 607* are located in Parcel 16 and were built in 1990 and 1978, respectively, and have never been surveyed for asbestos.

*Building 567* was built in 1990 and is located in Parcel 28. This building has never been surveyed for asbestos.

*Structure 569 and Building 590* were built in 1992 and 1991, respectively. Both structures are located in Parcel 16, and have never been surveyed for asbestos.

*Building 584 and Structure 592* were built in 1991 and are located in Parcel 16. They have never been surveyed for asbestos.

*Building 597* was built in 1992 and is located on Parcel 16. This building has never been surveyed for asbestos.

*Building 602* was built in 1992 and is located in Parcel 1. This building has never been surveyed for asbestos.

*Building 3002T and Structures 6168, and 6798* are located in Parcels 40, 29, and 23, respectively (dates of construction unknown). This building and structures have never been surveyed for asbestos.

*Structure 6480* is located in Parcels 34 and 40 (date of construction unknown). This structure has never been surveyed for asbestos.

*Building 6873 and Structure 6874* were built in 1992 and are located in Parcels 35 and 41. This building and structure have never been surveyed for asbestos.

*Structures 6875 and 6876* were built in 1992 and are located in Parcel 35. These structures have never been surveyed for asbestos.

*Structures 6877, 6878, 6879, and 6880* were built in 1992 and are located in Parcel 34. These structures have never been surveyed for asbestos.

*Irvine Park North Housing and Irvine Park South Housing Communities* were built between 1979 and 1982 and are located in Parcels 34, 35, and 36. The 1995 asbestos surveys reported only non-friable ACM (floor tile and mastic).

*Moffett Meadows Housing Community* was built in 1964 and is located in Parcel 35. The 1995 asbestos surveys reported friable and non-friable ACM.

*Tustin Villas Housing Community* was built in 1984 and is located on Parcel 23. No ACM was identified during the 1995 asbestos surveys.

#### **8.6.1.2 Buildings/Structures Planned For Reuse**

*Building 132* was built in 1961 and is located in Parcel 1. The 1991 asbestos survey reported ACM in the building, but the 2001 asbestos survey confirmed no FAD ACM in the building. See Table 7 for a description.

*Building 177* was built in 1968 and is located on Parcel 1. The 1988 asbestos survey reported friable material, however the 2001 asbestos survey confirmed no FAD ACM in the building.

*Building 184* was built in 1969 and is located on Parcel 1. The 1991 asbestos survey reported friable material, but the 2001 asbestos survey confirmed no FAD ACM in the building.

**Building 213** was built in 1973 and is located on Parcel 1. The 1988 asbestos survey reported ACM in the buildings and the 2001 asbestos surveys reported FAD ACM in the building. DON completed abatement of the FAD ACM in April 2002.

**Building 218** was built in 1976 and is located on Parcel 1. The 1997 asbestos survey reported friable (good) ACM in the building.

**Building 227** was built in 1981 and is located on Parcel 1. The 1988 asbestos survey reported ACM in transite panes and floor tiles, and the 2001 asbestos survey confirmed no FAD ACM in the building.

**Structure 239** was built in 1968 and is located on Parcel 1. This structure has never been surveyed for asbestos.

**Structure 241** was built in 1968 and is located in Parcel 16. This structure has never been surveyed for asbestos.

**Buildings 245, 246, and 249** were built in 1984 and are located on Parcel 1. These buildings have never been surveyed for asbestos.

**Structures 278, 279, 550, and 603** were built in 1984 and are located on Parcel 1. These structures have never been surveyed for asbestos.

**Buildings 524 and 526** were built in 1988 and are located on Parcel 1. These buildings have never been surveyed for asbestos.

**Buildings 538 and 549** were built in 1989 and are located on Parcel 1. These buildings have never been surveyed for asbestos.

**Building 561** was built in 1990 and is located on Parcel 1. This building has never been surveyed for asbestos.

## **8.6.2 Restrictions - Asbestos-Containing Material**

### **8.6.2.1 Buildings/Structures Planned For Demolition Or "To Be Determined (TBD)"**

**Building 5** - Since FAD ACM was observed in this building, it will be restricted from occupancy. "Occupation" includes access in the vicinity of the buildings, with the exception of short-term tours and emergency maintenance with prior DON notification and approval. The deed will indicate that the transferee assumes responsibility for the management of ACM, including surveys, removal and/or management of ACM prior to or during demolition, in accordance with all applicable local, state, and federal laws. This building may only be occupied if the transferee conducts the necessary ACM surveys and abatement according to all local, state, and federal requirements prior to occupancy or renovation.

**Building 172, Irvine Park North Housing, Irvine Park South Housing, and Moffett Meadows Housing** - Since the ACM surveys for these buildings were

conducted prior to 1997, the physical condition of the interior ACM as stated in the existing reports may no longer be accurate. Nevertheless, since the buildings are slated for demolition, or have a disposition of 'to be determined', DON is not obligated to conduct any additional surveys. In accordance with policy, these buildings will be restricted from occupancy prior to demolition. The deed will indicate that the transferee assumes responsibility for the management of ACM, including the surveys, removal and/or management of ACM prior to or during demolition, in accordance with all applicable local, state, and federal laws. These buildings may only be occupied if the transferee conducts the necessary ACM surveys and abatement according to all local, state, and federal requirements prior to occupancy or renovation.

***Buildings 23A, 23B, 23C, 23D, 23E, 23F, 182, and Tustin Villas Housing*** - Since no interior ACM was observed in these buildings and they are not designated for reuse, restrictions for occupancy due to ACM will not be imposed by DON. However, the transferee must still assume responsibility for the management of the existing ACM, including surveys, removal and/or management of ACM prior to or during demolition, if any is detected in the buildings.

***Buildings 162, 254, 516, 562, 567, 573, 574, 584, 590, 597, 602, 3002T, and 6873 and Structures 10M, 10P, 39, 215, 236, 569, 592, 607, 6168, 6480, 6798, 6874, 6875, 6876, 6877, 6878, 6879, and 6880*** - Since no ACM surveys have been conducted, these buildings/structures are restricted from occupancy prior to demolition. The deed will indicate that the transferee assumes responsibility for the management of ACM, including surveys, removal and/or management of ACM prior to or during demolition, in accordance with applicable laws. Since the buildings/structures are not designated for reuse, DON is not obligated to conduct an asbestos survey. These buildings/structures may only be occupied if the transferee conducts the necessary ACM surveys and abatement according to all local, state, and federal requirements prior to occupancy or renovation.

#### **8.6.2.2 Buildings/Structures Planned For Reuse**

***Buildings 132, 177, 184, 213, 218, and 227*** - Since no FAD ACM was found in these buildings, restrictions for occupancy due to ACM will not be imposed by DON. However, the transferee must still assume responsibility for the management of ACM, if detected in the buildings.

***Buildings 245, 246, 249, 524, 526, 538, 549, and 561*** - Since no ACM surveys have been conducted on these buildings they will be restricted from occupancy until the necessary surveys and abatement have been conducted in accordance with all local, state, and federal requirements. Surveys and associated abatement for these buildings will be negotiated with the transferee as a requirement of the property transfer.

*Structures 239, 241, 278, 279, 550, and 603* - No ACM surveys have been conducted on these structures. However, because these structures are not designed for human occupancy (see Table 1), they may be transferred without restrictions for occupancy due to ACM.

## **8.7 Notifications And Restrictions - Lead-Based Paint**

The following text provides information on LBP evaluations for these parcels including the requirements for surveys, notification of survey results, and restrictions based on identified LBP hazards prior to transfer of property or during demolition.

### ***Residential Buildings***

DON policy for residential buildings is contained in the joint U.S. EPA/DoD interim final Lead-Based Paint Guidelines for Disposal of Department of Defense Residential Real Property (DoD 1999). The policy applies specifically to "target housing" which is housing constructed before 1978, except for homes designated for elderly or disabled persons and/or dwellings in which living areas are not separated from the sleeping area (e.g., barracks). The policy further requires that federally-owned residential real property scheduled for transfer be subject to:

- Inspection, risk assessment, and abatement of lead-based paint hazards (lead-based paint, soil, and dust) in target housing constructed prior to 1960.
- Inspections and risk assessment for target housing constructed between 1960 and 1978.

Additional requirements in the U.S. EPA/DoD policy related to LBP include:

- Soil lead hazards surrounding target housing constructed between 1960 and 1978 will be abated by DON or will be abated by the transferee as part of the transfer agreement.
- For child-occupied facilities (i.e., day care centers, preschools) located on residential real property that will be reused as child occupied facilities after transfer, DON will evaluate for lead-based paint hazards.
- The soil adjacent to target housing scheduled for demolition and planned for redevelopment after transfer will be evaluated for soil-lead hazards by the transferee after demolition of the existing target residential buildings. The transferee will conduct abatement of soil-lead hazards identified in the evaluation prior to occupancy of the new residential buildings.

Prior to transferring the property, DON is required to document survey results by disclosing known LBP and/or LBP hazards in the Basewide EBS and referencing the evaluation results in the FOST and transfer documents for residential buildings. If hazards exist at the time of transfer, the transfer

document will prohibit occupancy of residential buildings until the buildings are demolished. Demolition of LBP-containing buildings must be performed in accordance with local, state, and federal requirements.

Buildings that are scheduled for demolition may be occupied on an interim basis if the transferee conducts the necessary LBP surveys and abatement in accordance with all local, state, and federal requirements. In the event the transferee conducts LBP abatement activities prior to demolition, the transferee shall, prior to occupation of the buildings, conduct soil sampling in the areas where the residential buildings are located to verify that soil has not been adversely affected by the release of LBP.

### ***Nonresidential Buildings***

In order to address the risk of adverse health effects to children from LBP exposure, legislation and national policy regarding LBP has focused on residential areas and child-occupied facilities where children may be present. Non-residential buildings (e.g., warehouses and office buildings) are typically occupied by adults with minimal exposure to children. DON will not conduct sampling at non-residential buildings prior to transfer. Evaluation and abatement of LBP at non-residential buildings will be the responsibility of the transferee.

Demolition of LBP-containing buildings must be performed in accordance with applicable local, state, and federal requirements. Non-residential buildings scheduled for demolition will require post-demolition soil sampling and abatement of soil-lead hazards by the transferee prior to occupation of any new buildings. Buildings which are scheduled for demolition may be occupied on an interim basis if the transferee conducts the necessary LBP surveys and abatement in accordance with all local, state, and federal requirements.

Information pertaining to LBP at non-residential buildings, if any, will be provided to the transferee with the transfer documents. Notification of potential LBP at non-residential buildings where surveys were not conducted will be based solely on the age of construction (i.e., constructed before 1978).

## **8.7.1 Notifications - Lead-Based Paint**

Residential housing within the transfer parcels include Irvine Park North Housing, Irvine Park South Housing, Moffett Meadows Housing, and Tustin Villas. All housing areas except Moffett Meadows were constructed after 1978, and therefore do not require lead-based paint surveys. However, surveys were conducted in 1994 as part of a basewide housing study. The surveys consisted of lead-in-paint, lead-in-soil, and lead-in-dust sampling at a representative number of residential buildings. Lead-in-soil results from the housing areas were below 110 milligrams per kilogram and lead-in dust results were below HUD guidelines. Lead-in-paint was only identified within Moffett Meadows and

subsequent abatement was conducted in 1996 and 1997. A copy of the lead survey reports will be included in the transfer documentation for each applicable parcel.

A LBP survey was conducted at the Moffett Meadows housing area in November 2001 and consisted of sampling for potential soil-lead hazards at 19 of the 67 residential buildings. All lead samples collected were at or below 103 milligrams per kilogram. Based on the results of the sampling, there are no significant hazards due to the presence of lead in soil at the Moffett Meadows housing area and no further action is required. However, restrictions will be placed on the housing area based on the presence of LBP previously identified in the exterior paint of the residential buildings.

There are a total of 60 non-residential buildings/structures located within the transfer property. Of these buildings/structures, the following were constructed before 1978 when LBP was commonly used throughout the United States, including military installations, therefore, they are assumed to contain LBP:

**Building 5** (Parcel 1) was previously used for administration and barracks. This building's disposition is to be determined after transfer, however the area is planned for educational/recreational use.

**Structure 10M** (Parcel 1) is a well pump. This structure's disposition is to be determined after transfer and the area is planned for educational/recreational use.

**Structure 10P** (Parcel 29) is a well casing. This structure is scheduled for demolition after transfer and the area will be redeveloped for residential use.

**Structure 39** (Parcel 27) is a wind direction indicator. This structure is scheduled for demolition after transfer and the area will be redeveloped for residential use.

**Building 23A** (Parcel 28) was previously used as a permitted hazardous waste storage area. This building is scheduled for demolition after transfer and the area will be redeveloped for residential use.

**Building 23B** (Parcel 28) was previously used as an ammunition storage magazine. This building is scheduled for demolition after transfer and the area will be redeveloped for residential use.

**Building 23C** (Parcel 29) was previously used as a hazardous material storage area. This building is scheduled for demolition after transfer and the area will be redeveloped for residential use.

**Building 23D** (Parcel 29) was previously used as an inert storage magazine area. This building is scheduled for demolition after transfer and the area will be redeveloped for residential use.

**Building 23E** (Parcel 29) was previously used for storage of fuse and detonator magazines and ordinance. This building is scheduled for demolition after transfer and the area will be redeveloped for residential use.

**Building 23F** (Parcel 29) was previously used for storage of inert magazines and hazardous materials. This building is scheduled for demolition after transfer and the area will be redeveloped for residential use.

**Building 132** (Parcel 1) was previously used as bachelors enlisted quarters. This building is scheduled for reuse for educational/recreational purposes. Previous sampling results for LBP conducted in 1996 at the building identified LBP on exterior stair risers, posts, and handrails. A copy of the survey results will be provided to the transferee.

**Building 162** (Parcels 23 and 40) is the public toilet at the playground. This structure is scheduled for demolition after transfer and the area will be redeveloped for residential use.

**Building 172** (Parcel 1) was previously used as equipment storage, bulk fuel area. This building is scheduled for demolition after transfer and the area will be redeveloped for educational/recreational purposes.

**Building 177** (Parcel 1) was previously used as bachelors enlisted quarters. This building is scheduled for reuse for educational/recreational purposes. Previous sampling for LBP conducted in 1996 at the building identified LBP on interior stairs and exterior ladder to the roof. A copy of the survey results will be provided to the transferee.

**Building 182** (Parcels 16 and 40) was previously used as a line maintenance shack. This building is scheduled for demolition after transfer and the area will be redeveloped for commercial/business.

**Building 184** (Parcel 1) was previously used as the enlisted mess hall. This building is scheduled for reuse for educational/recreational purposes.

**Building 213** (Parcel 1) was previously used as bachelors enlisted quarters. This building is scheduled for reuse for educational/recreational purposes. Previous sampling for LBP conducted in 1996 at the building identified LBP on interior walls and exterior stairs. A copy of the survey results will be provided to the transferee.

**Structure 215** (Parcel 35) was previously used as the playground at the senior noncommissioned officer headquarters. This structure's disposition is to be determined after transfer and the area is planned for residential use.

**Building 218** (Parcel 1) was previously used as the Oasis Club used for recreation and leisure. This building is scheduled for reuse for educational/recreational purposes.

*Structure 236* (Parcel 1) is a transformer pad. This structure's disposition is to be determined after transfer and the area is planned for educational/recreational use.

*Structure 239* (Parcel 1) is a transformer pad. This structure is scheduled for reuse after transfer and the area will be redeveloped for educational/recreational use.

*Structure 241* (Parcel 16) is a transformer pad. This structure is scheduled for reuse after transfer for commercial/business purposes.

*Building 3002T* (Parcel 40) is a guardhouse with an unknown construction date. This structure is scheduled for demolition after transfer for use as a circulation facility.

*Structure 6168* (Parcel 29) is a sewage pump station with an unknown construction date. This structure is scheduled for demolition after transfer for residential use.

*Structure 6480* (Parcel 34) is a sewage pump station with an unknown construction date. This structure's disposition is yet to be determined after transfer of the area for residential use.

*Structure 6798* (Parcel 23) is a sanitary sewer with an unknown construction date. This structure is scheduled for demolition after transfer of the area for residential use.

*Structures 6877 and 6878* (Parcel 34) are a handball and tennis court, respectively, with unknown dates of construction. The dispositions of these structures are yet to be determined after transfer of the area for residential use.

The ages of construction for these buildings and structures suggest the likelihood that LBP may be present. Therefore, there is a possibility that, through the normal weathering, lead from LBP is present in the soil surrounding these structures.

## **8.7.2 Restrictions - Lead-Based Paint**

### **8.7.2.1 Residential Buildings**

*Moffett Meadows Housing Area* - Since LBP hazards were identified in the exterior paint during the 1994 survey and the residential buildings are scheduled for demolition, the transfer document will restrict the transferee from using these buildings prior to demolition. Additionally, the transfer document will require the transferee to demolish the buildings in accordance with local, state, and federal requirements and conduct post-demolition sampling of the soil and conduct any required abatement prior to occupancy of any newly constructed buildings. If the residential buildings are designated for reuse after transfer, the

transferee will be responsible for conducting all LBP surveys and abatement prior to occupation of these buildings.

*Irvine Park North Housing, Irvine Park South Housing, and Tustin Villas -*  
There are no restrictions based on LBP for these housing areas.

#### **8.7.2.2 Nonresidential Buildings/Structures**

*Buildings 5, 23A through F, 162, 172, 182, and 3002T* - Since these buildings were constructed prior to 1978 (when LBP was potentially used) and have a property use designation of 'to be determined' or scheduled for demolition, use of these buildings is restricted from residential use and children will not be allowed to occupy these buildings. If the buildings are slated for demolition or later become identified as 'to be demolished', the transferee will be required to demolish the buildings in accordance with local, state, and federal requirements and conduct post-demolition soil sampling and abatement of any soil-lead hazards.

*Buildings 132, 177, 184, 213, and 218* - Since these buildings were constructed prior to 1978 (when LBP was potentially used) and will be reused after transfer, use of these buildings is restricted from residential use and children will not be allowed to occupy these buildings. The future property uses identified for these buildings are for educational or commercial/business (no residential use).

*Structures 10M, 10P, 39, 215, 236, 239, 241, 6168, 6480, 6798, 6877, and 6878* - Since these structures do not have painted surfaces (or limited amounts) and the types of activities do not suggest previous paint use or occupancy of structure, no restrictions are required based on LBP.

*All remaining Buildings and Structures (Table 1)* - Since these buildings were constructed after 1978, no restrictions or requirements are necessary for LBP.

### **8.8 Notification - Unexploded Ordnance**

Former range areas within the transfer boundaries include: one pistol/rifle range located in Parcel 34 (with a safety arc in 28, 40, 41) and three skeet ranges located in Parcels 24, 34 and 35. Based on the historical uses of the ranges, potential ordnance or explosive hazards were limited to small caliber debris.

In 1979 the pistol/rifle range located at Parcel 34 was deactivated and disposed of by demolition. The area was cleared and grubbed during base housing construction in 1979 and 1982; approximately 2-3 feet of native topsoil was removed and replaced with clean fill material. The former pistol/rifle range was investigated as part of IRP-2 and the RI recommended NFA for the site. All environmental investigations conducted at MCAS Tustin have suggested that ordnance and/or explosive hazards do not remain on the property (BNI 2001).

## **8.9 Notification – School Site Considerations**

Parcels 1 and 17 have been proposed in the Reuse Plan for educational/recreational use after transfer. Should the subject parcel be considered for the proposed acquisition and/or construction of school properties utilizing state funding, a separate environmental review process in compliance with the California Education Code section 17210 et. seq. will need to be conducted by the transferee and approved by the DTSC (School Property Evaluation and Cleanup Division). The California Education Code requires that a comprehensive evaluation of natural and manmade hazardous materials be conducted for school properties. This comprehensive evaluation requires additional investigation of hazardous materials outside the scope of CERCLA hazardous substances. This additional evaluation includes: legally applied pesticides and herbicides, imported fill materials, naturally occurring hazardous substances such as heavy metals (e.g., chromium, mercury, nickel), metalloids (e.g., arsenic, selenium), gases (e.g., methane, hydrogen sulfide), and radioactive elements (e.g., radon gas) and naturally occurring petroleum deposits. The evaluation also includes asbestos-containing materials and lead-based paint at concentrations that fall outside the scope of CERCLA.

Any requirements associated with the evaluation of the proposed school site for compliance with the California Education Code are the sole responsibility of the transferee.

## **8.10 Notification - Monitoring Wells**

Parcels 1, 27, 28, 29, 40, and 41 contain groundwater monitoring wells and surface water gauging locations that are periodically monitored (see Table 8). These monitoring wells, surface water gauging locations, and their associated equipment shall not be altered, disturbed, or removed without the prior review and written approval of DON and the BCT.

## **8.11 Covenant – Additional Remedial Action**

The deed for transfer of parcels on which “any hazardous substance was stored for one year or more, [or] known to have been released, or disposed of...” as a result of former activities conducted by the United States, will include a covenant made pursuant to CERCLA Section 120(h)(3)(A)(ii)(II). The covenant will warrant “that any additional remedial action found to be necessary after the date of such transfer shall be conducted by the United States.” This covenant will apply to Parcels 23, 29, 34, 35, and 36, and portions of 1, 16, 17, 24, 27, 28, 40, and 41 (see Hazardous Substance Notification Table in Attachment 3). This covenant will not apply to any remedial action required on the property that is a result of an act or omission of the transferee that causes a new release of hazardous substances.

## 8.12 Right Of Access

The deed shall reserve and the transferee shall grant to the United States an appropriate right of access to the FOST parcels, pursuant to CERCLA Section 120(h)(3)(A)(iii), to enable the United States and others to enter said parcels in any case in which remedial action or corrective action is found to be necessary on said parcels or adjacent property after the date of property transfer.

Access to groundwater monitoring wells and surface water gauging locations in Parcels 1, 27, 28, 29, 40, and 41 (Table 8) for periodic monitoring and/or abandonment will also be required after property transfer (Figure 10).

## 9.0 FINDING OF SUITABILITY

Pursuant to CERCLA Section 120(h)(3)(A)(i) and the provisions of 40 *Code of Federal Regulations* Part 373, the deed will contain a notice of hazardous substances stored, released, or disposed within the applicable transfer parcels at MCAS Tustin. A release or disposal of hazardous substances or petroleum products has occurred within the transfer boundaries of Parcels 1, 16, 23, 27, 28, 29, 34, 35, and 40 included in this FOST. The Hazardous Substances Notification Table and Petroleum Products Notification Table are provided in Attachment 3. The Petroleum Products Notification Table lists the UST/AST and AOC sites (containing petroleum products), which are within the scope of the CERCLA Petroleum Exclusion set forth in CERCLA Section 101(14).

On the basis of the foregoing information and analysis, I have concluded that the requirements of CERCLA Section 120(h)(3) have been met, and I find that Parcels 23, 29, 34, 35, and 36, and portions of 1, 16, 17, 24, 27, 28, 40, and 41, with the exception of the identified CO areas, are suitable for transfer by deed for the intended purpose, subject to the notifications and restrictions set forth in Section 8.0. The parcels can be used with acceptable risk to human health and the environment and without interference with the environmental restoration process.

Date

4/22/02



G. A. ENGLE  
Captain, CEC, U.S. Navy  
Commander

M62535.001945  
MCAS TUSTIN  
SSIC # 5090.3

## TABLES

FINDING OF SUITABILITY TO TRANSFER  
FOR PARCELS 23, 29, 34, 35, AND 36, AND  
PORTIONS OF 1, 16, 17, 24, 27, 28, 40 AND 41

DATED 22 APRIL 2002

**Table 1**  
**Buildings and Structures**  
**Within Transfer Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40 and 41**

| Building (B)/<br>Structure (S) <sup>a, b</sup> | Parcel | Prior Use <sup>c, d</sup>  | Year<br>Built <sup>c</sup> | Total<br>Area<br>(sq. ft.) <sup>c</sup> | Proposed<br>Disposition <sup>e</sup> | Ultimate<br>Parcel Use <sup>b</sup> |
|--|--------|--|----------------------------|---|--------------------------------------|-------------------------------------|
| B 5  | 1      | Administration and Barracks  | 1943                       | 22,466                                  | To be<br>determined                  | Educational/<br>Recreational        |
| S 10M  | 1      | Well Pump  | 1943                       | 150                                     | To be<br>determined                  | Educational/<br>Recreational        |
| B 132  | 1      | Bachelor Enlisted Quarters   | 1961                       | 30,636                                  | Reuse                                | Educational/<br>Recreational        |
| B 172  | 1      | Equipment Storage, Bulk Fuel   | 1966                       | 2,520                                   | Demolition                           | Educational/<br>Recreational        |
| B 177  | 1      | Bachelor Enlisted Quarters   | 1968                       | 23,052                                  | Reuse                                | Educational/<br>Recreational        |
| B 184  | 1      | Enlisted Mess Hall   | 1969                       | 22,007                                  | Reuse                                | Educational/<br>Recreational        |
| B 213  | 1      | Bachelor Enlisted Quarters   | 1973                       | 35,424                                  | Reuse                                | Educational/<br>Recreational        |
| B 218  | 1      | Oasis Club<br>(Recreation/Leisure)/<br>Enlisted Men's Club             | 1976                       | 10,384                                  | Reuse                                | Educational/<br>Recreational        |
| B 227  | 1      | Bachelor Enlisted Quarters   | 1981                       | 48,960                                  | Reuse                                | Educational/<br>Recreational        |
| S 236  | 1      | Transformer Pad (Southeast<br>of Bldg. 254 for AST-194<br>Refueler #1) | 1973                       | 9                                       | To be<br>determined                  | Educational/<br>Recreational        |
| S 239  | 1      | Transformer Pad (west end<br>Bldg. 177)                                | 1968                       | 171                                     | Reuse                                | Educational/<br>Recreational        |
| B 245  | 1      | Bachelor Enlisted Quarters   | 1984                       | 47,370                                  | Reuse                                | Educational/<br>Recreational        |
| B 246  | 1      | Bachelor Enlisted Quarters   | 1984                       | 47,370                                  | Reuse                                | Educational/<br>Recreational        |
| B 249  | 1      | Heating Plant  | 1984                       | 768                                     | Reuse                                | Educational/<br>Recreational        |
| B 254  | 1      | Refueler Administration  | 1984                       | 700                                     | Demolition                           | Educational/<br>Recreational        |
| S 278  | 1      | Basketball Court #1  | 1984                       | 5,600                                   | Reuse                                | Educational/<br>Recreational        |
| S 279  | 1      | Volleyball Court   | 1984                       | 4,000                                   | Reuse                                | Educational/<br>Recreational        |
| B 524  | 1      | Maintenance Hangar<br>(North)/Helicopter Support<br>Operation          | 1988                       | 45,890                                  | Reuse                                | Educational/<br>Recreational        |
| B 526  | 1      | Utility Building Shed for<br>Bldgs. 524 and 525                        | 1988                       | 1,672                                   | Reuse                                | Educational/<br>Recreational        |
| B 538  | 1      | Bachelor Enlisted Quarter<br>(Replaced Bldg. 133)                      | 1989                       | 53,240                                  | Reuse                                | Educational/<br>Recreational        |
| B 549  | 1      | Mechanical Room at Bldg.<br>538  | 1989                       | 933                                     | Reuse                                | Educational/<br>Recreational        |
| S 550  | 1      | Transformer Pad at Bldg. 245   | 1984                       | 171                                     | Reuse                                | Educational/<br>Recreational        |

**Table 1 (continued)**  
**Buildings and Structures**  
**Within Transfer Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40 and 41**

| Building (B)/<br>Structure (S) <sup>a, b</sup> | Parcel | Prior Use <sup>c, d</sup>                                  | Year<br>Built <sup>c</sup> | Total<br>Area<br>(sq. ft.) <sup>c</sup> | Proposed<br>Disposition <sup>e</sup> | Ultimate<br>Parcel Use <sup>b</sup> |
|--|--------|--|----------------------------|---|--------------------------------------|-------------------------------------|
| B 561  | 1      | Mechanical Bldg. (Heat/Cool<br>for Bldg. 539)              | 1990                       | 933                                     | Reuse                                | Educational/<br>Recreational        |
| B 573  | 1      | Hazardous Waste Storage                                    | 1991                       | 80                                      | Demolition                           | Educational/<br>Recreational        |
| B 574  | 1      | Hazardous Waste Storage                                    | 1991                       | 150                                     | Demolition                           | Educational/<br>Recreational        |
| B 602  | 1      | Hazardous/Flammable<br>Material Locker                     | 1992                       | 100                                     | Demolition                           | Educational/<br>Recreational        |
| S 603  | 1      | Switch Gear Pad (for Bldg.<br>550)                         | 1984                       | 77                                      | Reuse                                | Educational/<br>Recreational        |
| B 182  | 16, 40 | Line Maintenance Shack                                     | 1967                       | 1,050                                   | Demolition                           | Commercial/<br>Business             |
| S 241  | 16     | Transformer Pad for Bldg.<br>182                           | 1968                       | 117                                     | Reuse                                | Commercial/<br>Business             |
| B 562  | 16     | Operation Vehicle Equipment<br>Warehouse                   | 1990                       | 2,363                                   | Demolition                           | Commercial/<br>Business             |
| S 569  | 16     | Par Site   | 1992                       | 700                                     | Demolition                           | Commercial/<br>Business             |
| B 584  | 16     | Hazardous Waste Storage                                    | 1991                       | 150                                     | Demolition                           | Commercial/<br>Business             |
| B 590  | 16     | Hazardous Waste Storage                                    | 1991                       | 100                                     | Demolition                           | Commercial/<br>Business             |
| S 592  | 16     | Generator (near Structure<br>569)                          | 1991                       | 180                                     | Demolition                           | Commercial/<br>Business             |
| B 597  | 16     | Hazardous/Flammable<br>Material Locker                     | 1992                       | 100                                     | Demolition                           | Commercial/<br>Business             |
| S 607  | 16     | Weather Transmitter  | 1978                       | 156                                     | Demolition                           | Commercial/<br>Business             |
| B 162  | 23, 40 | Public Toilet at Playground                                | 1965                       | 245                                     | Demolition                           | Residential                         |
| S 6798   | 23     | Sanitary Sewer   | Unknown                    | 440                                     | Demolition                           | Residential                         |
| Tustin Villas<br>Housing                       | 23     | 91 multi-plex residential<br>buildings                     | 1984                       |   | Demolition                           | Residential                         |
| S 39   | 27     | Wind Direction Indicator                                   | 1943                       | 1,620                                   | Demolition                           | Residential                         |
| B 23A  | 28     | Permitted Hazardous Waste<br>Storage                       | 1942                       | 1,370                                   | Demolition                           | Residential                         |
| B 23B  | 28     | Ammunition Storage<br>Magazine                             | 1942                       | 1,370                                   | Demolition                           | Residential                         |
| B 567  | 28     | Permitted Hazardous Waste<br>Storage                       | 1990                       | 2,400                                   | Demolition                           | Residential                         |
| S 10P ( <i>not shown on<br/>figure</i> )       | 29     | Well Casing  | 1943                       | 6                                       | Demolition                           | Residential                         |
| B 23C  | 29     | Hazardous Material Storage                                 | 1942                       | 1,370                                   | Demolition                           | Residential                         |
| B 23D  | 29     | Inert Storage Magazine                                     | 1942                       | 1,270                                   | Demolition                           | Residential                         |
| B 23E  | 29     | Fuse and Detonator<br>Magazine Storage/Ordnance<br>Storage | 1942                       | 206                                     | Demolition                           | Residential                         |

**Table 1 (continued)**  
**Buildings and Structures**  
**Within Transfer Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40 and 41**

| Building (B)/<br>Structure (S) <sup>a, b</sup> | Parcel | Prior Use <sup>c, d</sup>   | Year<br>Built <sup>c</sup> | Total<br>Area<br>(sq. ft.) <sup>c</sup> | Proposed<br>Disposition <sup>e</sup> | Ultimate<br>Parcel Use <sup>b</sup> |
|--|--------|---|----------------------------|---|--------------------------------------|-------------------------------------|
| B 23F  | 29     | Inert Storage<br>Magazine/Hazardous<br>Material Storage                         | 1942                       | 2,520                                   | Demolition                           | Residential                         |
| S 6168   | 29     | Sewage Pump Station #1  | Unknown                    | 64                                      | Demolition                           | Residential                         |
| S 6480   | 34, 40 | Sewage Pump Station #3  | Unknown                    | 3,570                                   | To be<br>determined                  | Residential                         |
| S 6877   | 34     | Handball Court  | 1992                       | 5,000                                   | To be<br>determined                  | Residential                         |
| S 6878   | 34     | Tennis Court  | 1992                       | 7,200                                   | To be<br>determined                  | Residential                         |
| S 6879   | 34     | Half-Basketball Court   | 1992                       | 6,400                                   | To be<br>determined                  | Residential                         |
| S 6880   | 34     | Half Basketball/Volleyball<br>Court   | 1992                       | 8,000                                   | To be<br>determined                  | Residential                         |
| Irvine Park North<br>Housing                   | 34     | 77 multi-plex residential<br>buildings  | 1979, 1982                 |   | Demolition                           | Residential                         |
| S 215  | 35     | Playground at SNCO<br>Headquarters  | 1966                       |   | To be<br>determined                  | Residential                         |
| B 6873   | 35     | Community Center  | 1992                       | 5,000                                   | To be<br>determined                  | Residential                         |
| S 6874   | 35     | Picnic Shelter  | 1992                       | 300                                     | To be<br>determined                  | Residential                         |
| S 6875   | 35     | Picnic Shelter  | 1992                       | 300                                     | To be<br>determined                  | Residential                         |
| S 6876   | 35     | Tennis Court  | 1992                       | 7,200                                   | To be<br>determined                  | Residential                         |
| Moffett Meadows<br>Housing                     | 35     | 67 multi-plex residential<br>buildings  | 1964                       |   | Demolition                           | Residential                         |
| Irvine Park South<br>Housing                   | 35, 36 | 79 multi-plex residential<br>buildings (54 in Parcel 35 and<br>25 in Parcel 36) | 1981, 1982                 |   | Demolition                           | Residential                         |
| B 516  | 40, 1  | Police Station  | 1986                       | 1,551                                   | Demolition                           | Circulation<br>Facilities           |
| B 3002T  | 40     | Guard House at Rear Gate  | Unknown                    | 24                                      | Demolition                           | Circulation<br>Facilities           |

**Notes**

<sup>a</sup> No buildings/structures are located within transfer boundaries of Parcel 17 (Educational/Recreational) and Parcel 24 (Residential)

<sup>b</sup> Buildings/structures in each Parcel, Ultimate Parcel Use – Basewide Environmental Baseline Survey, Table 3-2 (BNI 2001a)

<sup>c</sup> Prior Use, Year Built, Total Area – Basewide Environmental Baseline Survey, Appendix C (BNI 2001a)

<sup>d</sup> All buildings are currently vacant

<sup>e</sup> Proposed Disposition – Basewide Environmental Baseline Survey, Appendix B (BNI 2001a)

**Acronyms/Abbreviation**

AST = aboveground storage tank

Bldg. = building

SNCO = senior noncommissioned officer

sq. ft. = square feet

**Table 2**  
**Areas of Concern**  
**Within Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40, and 41**

| AOC <sup>a, b</sup> | Parcel | Description <sup>c</sup>   | Status <sup>c</sup>   | Status Summary <sup>c</sup>                                      | Area Type <sup>c, d</sup> |
|---------------------|--------|--|---|--|---------------------------|
| AD-01               | 1      | A hole, 30 feet in diameter, 800 feet east of Red Hill Avenue and 800 feet north of Warner Avenue, was identified in an aerial photograph dated December 29, 1946. No evidence of a hole or disposal trench was identified. The site was subsequently covered with landscaping.  | RCRA AOC<br><br>RFA conducted<br><br>Final RFA report: NFA recommended<br><br>NFA concurrence | Complete<br><br>Complete (4/97)<br><br>Complete (Letter 7/24/97) | 3                         |
| AD-02               | 1      | Dark patches and a possible trench were identified in an aerial photograph dated February 1953. The area appears covered with "ground cover" vegetation in an aerial photograph dated January 11, 1958. Most of the area was subsequently covered by a parking lot adjacent to Bldg. 538. No trench or dark patches were identified during the visual site inspection (VSI).   | RCRA AOC<br><br>RFA conducted<br><br>Final RFA report: NFA recommended<br><br>NFA concurrence | Complete<br><br>Complete (4/97)<br><br>Complete (Letter 7/24/97) | 3                         |
| AMS-01              | 1      | A single-family dwelling and several other structures, including a horizontal aboveground tank, were identified in an aerial photograph dated June 28, 1942. The area is now bounded by Red Hill, Valencia, and Warner Avenues. The aerial photograph review indicated that the horizontal tank may have been used as a storage tank for petroleum/oil/lubricant (POL) or other chemicals. The site was subsequently covered by asphalt and was used as parking lot. No visible evidence of a horizontal tank or any other building could be identified during the VSI. No visible or reported releases were identified. | RCRA AOC<br><br>No site visit conducted<br><br>NFA concurrence                                | Complete (Letter 4/22/96)  | 1                         |
| AMS-07              | 1      | A dark spot on the north side of a dirt road east of Red Hill Avenue and near MAW-5, was identified in an aerial photograph dated February 28, 1963. The grass-covered area was surrounded by Hangar Nos. 524 and 525, AST No. 194, and Landing Apron Nos. 1 and 4. No evidence of a release was identified during the VSI.  | RCRA AOC<br><br>RFA conducted<br><br>Final RFA report: NFA recommended<br><br>NFA concurrence | Complete<br><br>Complete (4/97)<br><br>Complete (Letter 7/24/97) | 3                         |
| MAW-05              | 1      | Well #10 was a known visible well located on MCAS Tustin property.   | Active well<br><br>Removed from consideration by BCT  | Complete (Letter 7/12/01)  | 1                         |

**Table 2 (continued)**  
**Areas of Concern**  
**Within Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40, and 41**

| <b>AOC <sup>a, b</sup></b> | <b>Parcel</b> | <b>Description <sup>c</sup></b>   | <b>Status <sup>c</sup></b>   | <b>Status Summary <sup>c</sup></b>                   | <b>Area Type <sup>c, d</sup></b> |
|----------------------------|---------------|---|--|--|----------------------------------|
| MAW-07                     | 1, 40         | Destroyed Well #21 was a known visible well located on MCAS Tustin property.  | AWP AOC<br><br>Transferred to State of California DWR Abandoned Well Program<br><br>Well destroyed by RAC<br><br>NFA concurrence | Complete (1/12/00)<br><br>Complete (Letter 11/16/00) | 1                                |
| MAW-15                     | 1             | Not identified at this location during abandoned well investigation; however, an anomaly was identified for excavation and a location was identified for additional investigation.  | AWP AOC<br><br>Transferred to State of California DWR Abandoned Well Program<br><br>NFA concurrence                              | Complete (Letter 7/12/01)                            | 1                                |
| MMS-02D                    | 1             | The revised PR/Draft VSI report indicated there had been 18 reported small quantity spills since 1988 at the two aircraft fueling aprons (Parking Apron Nos. 1 and 2). The spills occurred during the fueling of aircraft and were mostly contained on the asphalt/concrete apron. The report recommended no sampling as the site was incorporated into the boundaries of former IRP-7. | RCRA AOC<br><br>No site visit conducted<br><br>NFA concurrence for MMS-02 (comprised of MMS-02A-F)                               | Complete (Letter 9/16/96)                            | 1                                |
| MMS-02E                    | 1             | The revised PR/Draft VSI report indicated there had been 18 reported small quantity spills since 1988 at the two aircraft fueling aprons (Parking Apron Nos. 1 and 2). The spills occurred during the fueling of aircraft and were mostly contained on the asphalt/concrete apron. The report recommended no sampling as the site was incorporated into the boundaries of former IRP-7. | RCRA AOC<br><br>No site visit conducted<br><br>NFA concurrence for MMS-02 (comprised of MMS-02A-F)                               | Complete (Letter 9/16/96)                            | 1                                |
| MMS-02F                    | 1             | The revised PR/Draft VSI report indicated there had been 18 reported small quantity spills since 1988 at the two aircraft fueling aprons (Parking Apron Nos. 1 and 2). The spills occurred during the fueling of aircraft and were mostly contained on the asphalt/concrete apron. The report recommended no sampling as the site was incorporated into the boundaries of former IRP-7. | RCRA AOC<br><br>No site visit conducted<br><br>NFA concurrence for MMS-02 (comprised of MMS-02A-F)                               | Complete (Letter 9/16/96)                            | 1                                |

**Table 2 (continued)**  
**Areas of Concern**  
**Within Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40, and 41**

| AOC <sup>a, b</sup> | Parcel | Description <sup>c</sup>   | Status <sup>c</sup>  | Status Summary <sup>c</sup>   | Area Type <sup>c, d</sup> |
|---------------------|--------|--|--|---|---------------------------|
| MWA-3               | 1      | Closed (paved over) unit (north of Bldg. 172) was a Fuels Branch facility operated by MWSS-374 for fueling equipment maintenance and inventory. The former wash area consisted of a 40- by 16-foot concrete pad sloped toward the drains. Oily water flowed through the drain into O/W SEP-172 (TOW-4), which was decommissioned and removed in 1993. The former O/W SEP discharged wastewater to the sanitary sewer system. The VSI reported the unit was not active and the integrity of the concrete pad was poor. Cracks were observed on the pad. Washing activities appeared to continue during 1995. According to the VSI, there was a moderate potential for migration of contamination into soil and groundwater from previous operations, mainly through the cracked concrete pad. There was no containment device other than the sloping floor to manage the wash water. TPH-contaminated soils were excavated and the site was paved over. Dates of operation were 1966 to 1995. | CERCLA AOC<br><br>RFA conducted<br><br>Final RFA report: soil removal and cleanup recommended under the RAC; groundwater to Basewide Study<br><br>Final RI report: NFA recommended for groundwater<br><br>Remediation completed<br><br>Draft NFA report issued: NFA recommended for soil<br><br>OU-2 RAP/Proposed Plan: NFA<br><br>OU-2 ROD/RAP: NFA | Complete<br><br><br>Complete (4/97)<br><br>Complete (11/97)<br><br>Complete<br><br>Complete<br><br>Complete (Letter 4/8/99)<br><br>Complete (ROD 9/28/00) | 4                         |
| ST-7                | 1      | Inactive. This unit (Bldg. 574) was operated by HMH-361 for temporary storage of drums containing hazardous waste. The unit was installed in 1991. Drums were stored on a fenced concrete pad with a sump within a 6-inch concrete containment berm. The dimensions of the area are 20 by 18 feet. The integrity of the entire storage and containment system appeared to be good. Stored wastes included solvents, oily rags, waste JP-5, and oil. Dates of operation were 1991 to 1999.  | RCRA AOC<br><br>Closure by RAC under RCRA<br><br>Closure report: NFA recommended<br><br>NFA concurrence  | Complete<br><br>Complete<br><br>Complete (Letter 2/24/00)   | 1                         |

**Table 2 (continued)**  
**Areas of Concern**  
**Within Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40, and 41**

| AOC <sup>a, b</sup> | Parcel | Description <sup>c</sup>  | Status <sup>c</sup>   | Status Summary <sup>c</sup>                               | Area Type <sup>c, d</sup> |
|---------------------|--------|---|---|---|---------------------------|
| ST-8                | 1      | Inactive. This unit (east of Bldg. 574) consists of three paint lockers operated by HMH-361. The lockers were used to store hazardous materials used in the maintenance of helicopters. The lockers were each 3 by 3 feet and are constructed of steel. No containment was provided around the lockers. The integrity of the storage area and containers was fair to good. Stored hazardous materials included paints, solvents, hydraulic fluids, and lubricants. Dates of operation were unknown to 1996.   | RCRA AOC<br><br>Closure by RAC under RCRA<br><br>Closure report: NFA recommended<br><br>NFA concurrence | Complete<br><br>Complete<br><br>Complete (Letter 2/24/00) | 1                         |
| ST-9A               | 1      | Closed. This unit (in the southeast corner of the enclosure for Bldg. 172) was a hazardous material storage area constructed in 1991 and operated by MWSS-374. The 23- by 28-foot area was located on asphalt pavement, lined with plastic, and bermed with sandbags. A locker was also located on the liner. Materials were stored in 55-gallon drums and cans of various sizes. The integrity of the storage area and containers was good. The hazardous materials storage areas had been relocated from a previous site (ST-9B). Hazardous materials formerly stored at this unit consisted primarily of paints and solvents used to label storage crates. Dates of operation were 1991 to 1995. | RCRA AOC<br><br>Closure by RAC under RCRA<br><br>Closure report: NFA recommended<br><br>NFA concurrence | Complete<br><br>Complete<br><br>Complete (Letter 9/24/99) | 4                         |
| ST-9B               | 1      | Inactive. This unit (south of Bldg. 172) occupied a 21- by 18-foot area as the former hazardous material storage area for ST-9A. The storage and containment systems appeared to follow the same protocol as ST-9A. Hazardous materials formerly stored at this unit consisted primarily of paints and solvents used to label storage crates. Dates of operation were unknown to 1991.  | RCRA AOC<br><br>Closure by RAC under RCRA<br><br>Closure report: NFA recommended<br><br>NFA concurrence | Complete<br><br>Complete<br><br>Complete (Letter 9/24/99) | 4                         |
| ST-10               | 1      | Closed. This unit (Bldg. 573) was operated by HMSS-374 for temporary storage of drums (less than 90 days) containing hazardous waste. It was installed in 1991. Drums were stored on a 16- by 16-foot fenced concrete pad with a sump within a 6-inch containment berm. The integrity of the entire storage and containment system was good. Wastes formerly stored at this unit included solvents, oily rags, waste JP-5, potassium bicarbonate, Speedy-Dry absorbent, and waste oil. Dates of operation were 1991 to 1995.  | RCRA AOC<br><br>Closure by RAC under RCRA<br><br>Closure report: NFA recommended<br><br>NFA concurrence | Complete<br><br>Complete<br><br>Complete (Letter 9/24/99) | 4                         |

**Table 2 (continued)**  
**Areas of Concern**  
**Within Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40, and 41**

| AOC <sup>a, b</sup> | Parcel | Description <sup>c</sup>  | Status <sup>c</sup>   | Status Summary <sup>c</sup>                                | Area Type <sup>c, d</sup> |
|---------------------|--------|---|---|--|---------------------------|
| ST-66               | 1      | Incorrectly identified in PR/VSI as hazardous materials storage unit. During the VSI, no hazardous wastes were observed (B-526). According to activity personnel, no hazardous wastes were stored at the site in the past.  | RCRA AOC<br><br>NFA concurrence   | Complete (Letter 4/22/96)                                  | 1                         |
| ST-68C              | 1      | Temporary storage unit (ST-68, referred to now as ST-68A, B, C) was identified as part of IRP-7 North (aircraft Parking Apron No. 1) and at IRP-7 south (ST-68A, referred to now as ST-68D, E, and F) in the revised PR/Draft VSI report. This report documented no evidence of a release, nor were hazardous wastes stored at the site.  | RCRA AOC<br><br>NFA concurrence for ST-68 (comprised of ST-68A-C)                                       | Complete (Letter 9/16/96)                                  | 1                         |
| ST-82               | 1      | Inactive. This unit (Bldg. 602) was built in 1992 and was operated by HMH-462 for temporary storage of hazardous materials. The unit was constructed of a concrete pad (with a sump) within a 6-inch berm. Dates of operation were 1992 to 1999.  | RCRA AOC<br><br>Closure by RAC under RCRA<br><br>Closure report: NFA recommended<br><br>NFA concurrence | Complete<br><br>Complete<br><br>Complete (Letter 2/24/00)  | 1                         |
| ST-90               | 1      | Inactive. This unit (Bldg. 524) was operated by MAG-16 Helicopter Squadron. It was constructed in 1988. The unit was specially designed to store, repair, and maintain helicopters. Three evenly 1 by 2 feet spaced sumps run along the unit interior to contain releases. The unit was approximately 115 by 186 feet. The integrity of the unit was good. Dates of operation were 1988 to 1998.  | RCRA AOC<br><br>Closure by RAC under RCRA<br><br>Closure report: NFA recommended<br><br>NFA concurrence | Complete<br><br>Complete<br><br>Complete (Letter 2/22/01)  | 4                         |
| TOW-03              | 1      | Inactive. This O/W SEP-526 was a 1,000-gallon steel unit located east of Bldg. 526 in an underground vault operated by Aircraft Maintenance. It was used to treat wastewater generated from fire fighting action during a fire in the hangars. The O/W SEP was connected to two 580-gallon USTs (526A and 526B), one for storage of waste oil and other for storage of waste fuel prior to off-site disposal. The system was equipped with an overflow alarm to warn of waste oil and waste fuel discharge into the sanitary sewer system. The unit was used only in the case of an emergency and no waste was generated unless fire extinguishers were used. Dates of operation were 1988 to 1999. | RCRA AOC<br><br>Closure by RAC under RCRA<br><br>Closure report: NFA recommended<br><br>NFA concurrence | Complete<br><br>Complete<br><br>Complete (Letter 11/16/00) | 1                         |

**Table 2 (continued)**  
**Areas of Concern**  
**Within Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40, and 41**

| AOC <sup>a, b</sup> | Parcel | Description <sup>c</sup>  | Status <sup>c</sup>   | Status Summary <sup>c</sup>                                      | Area Type <sup>c, d</sup> |
|---------------------|--------|---|---|--|---------------------------|
| TOW-04              | 1      | TOW-04, also referred to as O/W SEP-172C, was located north of Bldg. 172 in the northwest corner of the parking lot and was used by MWSS-374. The 220-gallon concrete tank (now removed) was used for separating oil and wastewater generated at a former wash area adjacent to Bldg. 172 (see MWA-3). Oily rinse water, probably containing solvents used during equipment cleaning, was generated from the former fueling equipment maintenance and inventory at Bldg. 172. According to O/W SEP Survey, the wastewater discharged to the sanitary sewer. Dates of operation were 1966 to 1993. | RCRA AOC<br><br>Closure by RAC under RCRA<br><br>NFA concurrence                              | Complete<br><br>Complete (Letter 6/6/97)                         | 1                         |
| AMBP-01             | 16     | Inactive. This unit was identified as a likely burn pit site in an aerial photograph dated February 24, 1947. The burn-pit-like structure was visible until 1953. The site has been regraded and subsequently used for vehicle operations. A loading ramp, a paint locker and a temporary storage unit are located southwest of the site. No evidence of a burn pit was identified at this site. Dates of operation were 1947 to 1953.  | RCRA AOC<br><br>RFA conducted<br><br>Final RFA report: NFA recommended<br><br>NFA concurrence | Complete<br><br>Complete (4/97)<br><br>Complete (Letter 7/24/97) | 3                         |
| AMS-02A             | 16     | Stains were identified north and south of the west end of Hangar No. 29 in an aerial photograph dated February 1953. The area identified in the aerial photograph was covered by asphalt at the time of the inspection. No evidence of staining was identified during the inspection, but discoloration was noticed along the boundary of the tarmac. Some cracking of the asphalt was noticed on the surface of the tarmac.  | RCRA AOC<br><br>No site visit conducted<br><br>NFA concurrence                                | Complete (Letter 4/22/96)  | 1                         |
| MMS-06              | 16     | In 1997, a JP-5 spill (approximately 500 gallons) occurred northeast of Bldg. 562, resulting in a release to the storm drain.   | RCRA AOC<br><br>Closure by RAC under RCRA<br><br>NFA concurrence                              | Complete<br><br>Complete (Letter 4/21/00)                        | 3                         |
| MMS-08              | 16     | In 1997, a JP-5 spill (approximately 500 gallons) occurred northeast of Bldg. 562, resulting in a release to the storm drain.   | RCRA AOC<br><br>Closure by RAC under RCRA<br><br>NFA concurrence                              | Complete<br><br>Complete (Letter 4/21/00)                        | 3                         |

**Table 2 (continued)**  
**Areas of Concern**  
**Within Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40, and 41**

| AOC <sup>a, b</sup> | Parcel | Description <sup>c</sup>  | Status <sup>c</sup>   | Status Summary <sup>c</sup>                               | Area Type <sup>c, d</sup> |
|---------------------|--------|---|---|---|---------------------------|
| ST-31A              | 16     | Closed. This unit (Bldg. 584) was operated by HMT-166 for temporary storage of drums containing hazardous waste. The unit was built in 1990. Drums were stored on a 20- by 20-foot, fenced concrete pad with a 6-inch concrete berm. At the time of the VSI, no waste was stored at this unit. The overall integrity of the system was good. Wastes formerly stored at the unit included JP-5, petroleum oil, hydraulic fluid with Freon, thinner, Speedy-Dry absorbent, rags with hydraulic fluid and Freon, and rags with fuel oil. Dates of operation were 1990 to 1995. | RCRA AOC<br><br>Closure by RAC under RCRA<br><br>Closure report: NFA recommended<br><br>NFA concurrence | Complete<br><br>Complete<br><br>Complete (Letter 9/24/99) | 4                         |
| ST-31B              | 16     | Inactive. This is the former site for the temporary storage of hazardous waste (ST-31A). It was used prior to 1990 and located north of ST-31A. It was constructed of a plastic liner over temporary aluminum tarmac pads, with a sandbag berm. Wastes formerly stored at the unit included JP-5, petroleum oil, hydraulic fluid with Freon, thinner, Speedy-Dry absorbent, rags with hydraulic fluid and Freon, and rags with fuel oil. Dates of operation were prior to 1990.   | RCRA AOC<br><br>Closure by RAC under RCRA<br><br>Closure report: NFA recommended<br><br>NFA concurrence | Complete<br><br>Complete<br><br>Complete (Letter 9/24/99) | 4                         |
| ST-75A              | 16     | Closed. This unit (Bldg. 597) was built in 1992 for temporary storage of hazardous materials. The unit was constructed of a concrete pad (with a sump) within a 6-inch berm. Material formerly stored at this unit included aircraft cleaning compound, engine gas and path cleaner. Dates of operation were 1992 to 1997.  | RCRA AOC<br><br>Closure by RAC under RCRA<br><br>Closure report: NFA recommended<br><br>NFA concurrence | Complete<br><br>Complete<br><br>Complete (Letter 9/24/99) | 3                         |
| ST-75B              | 16     | Inactive. This unit was a 10- by 10-foot dirt AST (fuel) area west of Bldg. 597. The unit was investigated by RAC as part of closure activities for the ST-75A unit. Dates of operation were 1992 to 1997.  | RCRA AOC<br><br>Closure by RAC under RCRA<br><br>Closure report: NFA recommended<br><br>NFA concurrence | Complete<br><br>Complete<br><br>Complete (Letter 9/24/99) | 3                         |

**Table 2 (continued)**  
**Areas of Concern**  
**Within Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40, and 41**

| AOC <sup>a, b</sup> | Parcel | Description <sup>c</sup>  | Status <sup>c</sup>   | Status Summary <sup>c</sup>  | Area Type <sup>c, d</sup> |
|---------------------|--------|---|---|--|---------------------------|
| AMS-13              | 23     | A light spot, less than 18 feet in diameter, located 413 feet northwest from the west edge of Pad No. 1, was identified in aerial photographs dated December 1952 and February 1953. The site was subsequently covered by base housing in the northwest corner of the base, specifically under Hanaubal Street. The addendum to the revised PR/Draft VSI report concluded that no hazardous wastes were stored or released from the site.   | RCRA AOC<br><br>No site visit conducted<br><br>NFA concurrence  | <br><br><br>Complete (Letter 9/16/96)                                    | 1                         |
| DI-01               | 23     | Demolished. An incinerator (Bldg. 15) was constructed in 1942 and was located at the north corner of the Base. The 1-ton unit, which was decommissioned and demolished in 1985/1986, was used to burn paper and other trash generated throughout MCAS Tustin. A 1947 aerial photograph delineates a triangular area at this site, identified as a solid waste disposal site, which may have been trenches for disposal of the incinerator ash. The area was subsequently developed for residential housing. No evidence of the incinerator was observed during the VSI.<br>The Second Addendum to revised PR/Draft VSI identified two extensions to this AOC. Extension 1 (Site 20) was a strip of land used as an automobile maintenance area and recreational vehicle (RV) parking lot from the 1950s through the 1970s. This site was located west of Severyns Road to the north of Bldg. 162. A wooden ramp was utilized to drive vehicles above ground, presumably to change fuel and/or oils which may then have been spilled onto the ground. Historical aerial photographs encompassing this area document the maintenance and RV parking activity. The southern portion of this area subsequently became a playground built on fill placed on top of the former ground surface.<br>Extension 2 (Site 37) was reported to be a wooden building with a wooden floor used during the 1960s and 1970s for NBC defense training (gas mask fit testing) located at what is now the corner of Severyns Road and Tessier Street. Further examination of historical aerial photographs and base maps and consultation with the Station Engineer revealed that the former incinerator building (Bldg. 15) at the northern end of Severyns Road was the site of the NBC training. Dates of operation were 1942 to 1987. | RCRA AOC<br><br>RFA conducted<br><br>Final RFA report: NFA recommended<br><br>NFA concurrence                         | <br><br>Complete<br><br>Complete (4/97)<br><br>Complete (Letter 7/24/97) | 3                         |
| MAW-01              | 23     | Well #9. Located off MCAS Tustin property under Edinger Avenue. No area type was given to this AOC because it is not located on MCAS Tustin property.   | AWP AOC<br><br>Transferred to State of California DWR Abandoned Well Program<br><br>Removed from consideration by BCT | <br><br><br>Complete (Letter 7/12/01)                                    |                           |

**Table 2 (continued)**  
**Areas of Concern**  
**Within Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40, and 41**

| AOC <sup>a, b</sup>        | Parcel | Description <sup>c</sup>  | Status <sup>c</sup>  | Status Summary <sup>c</sup>  | Area Type <sup>c, d</sup> |
|----------------------------|--------|---|--|--|---------------------------|
| MAW-09                     | 27     | Well #14. Not identified at this location during abandoned well investigation.  | AWP AOC<br><br>Transferred to State of California DWR Abandoned Well Program<br><br>NFA concurrence  | <br><br><br>Complete (Letter 7/12/01)                              | 1                         |
| STD-02<br>(formerly ST-53) | 28     | Inactive. This unit (Bldg. 23A) was a permitted storage facility (RCRA Part B Permit). Prior to August 1993, the unit was used for temporary storage of hazardous wastes. Wastes from temporary storage units throughout the base were taken to this unit for storage prior to transport off the installation. Bldg. 23A was built in 1942 as a bunker for ordnance storage. Dates of operation were 1942 to 1998.  | RCRA AOC<br><br>Closure by RAC under RCRA<br><br>Closure certification report<br><br>NFA concurrence | <br><br>Complete<br><br>Complete<br><br>Complete (Letter 11/10/99) | 1                         |
| STD-03                     | 28     | STD-03 is comprised of STD-03A (formerly ST-57A) and STD-03B (formerly ST-57B). Inactive. STD-03B was a former storage unit was located approximately 20 feet west of the STD-03A unit. The overall integrity of the unit was good. Wastes stored in the unit included oily rags, waste oil, Freon, and hydraulic fluid. Dates of operation were prior to 1991. The STD-03A unit (Bldg. 567) was a permitted storage facility (RCRA Part B Permit). The unit was operated by MCAS for temporary storage of hazardous waste. The unit was constructed in 1991 and was 40- by 60-foot, fenced concrete pad with a 6-inch containment berm. Approximately 75 drums were stored on the pad. A catch sump (2 by 2 feet) was located inside the unit to help contain releases. The overall integrity of the unit was good. Wastes stored in the unit included oily rags, waste oil, Freon, and hydraulic fluid. Dates of operation were 1991 to 1998. | RCRA AOC<br><br>Closure by RAC under RCRA<br><br>Closure certification report<br><br>NFA concurrence | <br><br>Complete<br><br>Complete<br><br>Complete (Letter 11/10/99) | 4                         |
| AS-3A                      | 29     | Bldg. 23F was identified in an aerial photograph dated June 28, 1942. The building was identified as a possible munitions or POL storage unit. The unit was used to store old furniture and munitions in the past. This unit is 40 by 50 feet and is located between two large land farms separated by a 60-foot-wide unpaved road. Dates of operation were 1942 to present.  | RCRA AOC<br><br>Closure by RAC under RCRA<br><br>Closure report<br><br>NFA concurrence               | <br><br>Complete<br><br>Complete<br><br>Complete (Letter 6/22/00)  | 4                         |

**Table 2 (continued)**  
**Areas of Concern**  
**Within Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40, and 41**

| AOC <sup>a, b</sup> | Parcel | Description <sup>c</sup>  | Status <sup>c</sup>  | Status Summary <sup>c</sup>                                      | Area Type <sup>c, d</sup> |
|---------------------|--------|---|--|--|---------------------------|
| AS-3B               | 29     | Bldg. 23D was identified in an aerial photograph dated June 28, 1942. The building was identified as a possible munitions or POL storage unit. The unit was used to store munitions. This unit is 30 by 50 feet and is located between two large land farms separated by a 60-foot-wide unpaved road. Dates of operation were 1942 to present.  | RCRA AOC<br><br>Closure by RAC under RCRA<br><br>Closure report<br><br>NFA concurrence   | Complete<br><br>Complete<br><br>Complete (Letter 6/22/00)        | 4                         |
| AS-3C               | 29     | Bunker 23E was identified in an aerial photograph dated June 28, 1942. The building was identified as a possible munitions or POL storage unit. The unit was used to store munitions. This unit is located between two large land farms separated by a 60-foot-wide unpaved road. This unit has a 328-foot circumference and is 490 feet west of Bldg. 23D and 505 feet west of Bldg. 23F. Dates of operation were 1942 to present.   | RCRA AOC<br><br>Closure by RAC under RCRA<br><br>Closure report<br><br>NFA concurrence   | Complete<br><br>Complete<br><br>Complete (Letter 6/22/00)        | 4                         |
| MAW-08              | 29     | Destroyed Well #5 was a known visible well located on MCAS Tustin property within the Osumi Corporate Yard (OCY-01).  | AWP AOC<br><br>Transferred to State of California DWR Abandoned Well Program<br><br>Well destroyed by RAC<br><br>NFA concurrence | Complete (5/22/00)<br><br>Complete (Letter 11/16/00)             | 1                         |
| OCY-01              | 29     | Agricultural maintenance and storage yard for Osumi Corporation. Osumi operations began in 1983 and replaced an earlier agricultural tenant. The compound included UST 23C (removed), two ASTs for diesel, an abandoned agricultural well (MAW-8), a wash pad constructed by Osumi, a septic leach field, and a temporary storage area for waste oil. The wash pad discharges to an unlined channel outside the fence on the east side of the compound. The compound also contains a maintenance building without drains, constructed by Osumi, and a number of trailers used for storage of dry agricultural chemicals. Dates of operation were 1983 to present. | RCRA AOC<br><br>RFA VSI conducted<br><br>Closure by RAC under RCRA<br><br>Closure report: NFA recommended<br><br>NFA concurrence | Complete (1996)<br><br>Complete<br><br>Complete (Letter 2/21/02) | 4                         |

**Table 2 (continued)**  
**Areas of Concern**  
**Within Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40, and 41**

| AOC <sup>a, b</sup> | Parcel | Description <sup>c</sup>  | Status <sup>c</sup>   | Status Summary <sup>c</sup>   | Area Type <sup>c, d</sup> |
|---------------------|--------|---|---|---|---------------------------|
| ST-81               | 29     | Inactive. This unit (Bldg. 23C) was a bunker built in 1942 for ordnance storage. It was used by MWSS-374 for temporary storage of hazardous materials. Dates of operation were 1942 to 1999.  | RCRA AOC<br><br>Closure by RAC under RCRA<br><br>Closure report: NFA recommended<br><br>NFA concurrence   | Complete<br><br>Complete<br><br>Complete (Letter 1/18/01)                   | 1                         |
| MRR-01              | 34     | Inactive. In the 1940s and early 1980s, a rifle range was located near Moffett Drive and Harvard Avenue. The area was developed as a residential area in the early 1980s. No visible evidence of a release was encountered during the VSI. The site was investigated under CLEAN I. Soil samples were analyzed for metals and none were detected above background levels. Dates of operation were 1940s and early 1980s.  | RCRA AOC<br><br>Confirmation samples were collected during ESI activities for IRP-2<br><br>Final ESI report: NFA recommended<br><br>NFA concurrence | Complete<br><br>Complete (Letter 12/17/96)<br><br>Complete (Letter 1/21/98) | 3                         |
| MCD-03              | 35     | A crash drill site was identified on a 1951 map approximately 1,700 feet southeast of Moffett Trench landfill. Review of a February 1953 aerial photograph identified a dark spot 330 feet south of Moffett Drive and 620 feet west of (old) Harvard Avenue that was thought to have been MCD-3. During the VSI, a map search was conducted but no other evidence for this site was identified. The area has been developed as residential housing.   | RCRA AOC<br><br>No site visit conducted<br><br>NFA concurrence  | Complete (Letter 4/22/96)   | 1                         |
| AD-03               | 40     | Holes or trenches, possibly indicative of disposal activities, were identified near Kilpatrick Road in an aerial photograph dated February 1963. Available aerial photographs indicate that activity continued in the area until January 1975. Since that time, the area appears to have been used as farmland. No evidence of disposal activities was identified during the VSI. However, the Second Addendum to revised PR/Draft VSI reported the existence of burn pits and a pond associated with crash crew drill activities in an area northeast of Helipads Nos. 4 and 5. These activities are consistent with the aerial photographic evidence and the time period for AD-3. The area is currently cultivated with crops. Dates of operation were 1963 to 1975. | RCRA AOC<br><br>RFA conducted<br><br>Final RFA report: NFA recommended<br><br>NFA concurrence   | Complete<br><br>Complete (4/97)<br><br>Complete (Letter 7/24/97)            | 3                         |

**Table 2 (continued)**  
**Areas of Concern**  
**Within Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40, and 41**

| AOC <sup>a, b</sup> | Parcel | Description <sup>c</sup>  | Status <sup>c</sup>  | Status Summary <sup>c</sup>   | Area Type <sup>c, d</sup> |
|---------------------|--------|---|--|---|---------------------------|
| AS-6                | 40, 27 | A possible hazardous materials storage unit was identified in an aerial photograph dated February 1953. Review of other available aerial photographs indicates storage activity occurred in the area until January 1975. Since that time the area appears to have been used as farmland. No evidence of any hazardous material storage structure was identified during the VSI. Subsequent activities have identified a building foundation at this site. This unit was within the area identified as AD-3. Dates of operation were 1953 to 1975. | CERCLA AOC<br><br>RFA conducted<br><br>Final RFA report: NFA recommended for soil; groundwater to Basewide Study<br><br>Final RI report: NFA recommended<br><br>OU-2 RAP/Proposed Plan: NFA<br><br>OU-2 ROD/RAP: NFA | Complete<br><br>Complete (4/97)<br><br>Complete (11/97)<br><br>Complete<br><br>Complete (ROD 9/28/00) | 3                         |

Notes:

- <sup>a</sup> No AOCs are located within Parcels 17, 24, 36, or 41
- <sup>b</sup> Known AOC sites in each Parcel – Basewide Environmental Baseline Survey, Table 3-2 (BNI 2001a)
- <sup>c</sup> AOC descriptions, Status, Status Summary, and Area Type – Basewide Environmental Baseline Survey, Table F-1 (BNI 2001a)
- <sup>d</sup> Area type based upon environmental condition as defined in the Base Realignment and Closure (BRAC) Cleanup Plan Guidebook Addendum (August 1996) and subsequent site investigation data (see Table 4)

**Table 2**  
**Areas of Concern**  
**Within Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40, and 41**

**Acronyms/Abbreviations:**

|         |   |   |      |   |  |
|---------|---|---|------|---|--|
| AD      | = | aerial photograph, possible disposal  | PR   | = | preliminary review                               |
| AMBP    | = | aerial photograph, miscellaneous, possible burn pit                           | RA   | = | Remedial Action                                  |
| AMS     | = | aerial photograph, miscellaneous, stain, possible spill                       | RAC  | = | remedial action contractor                       |
| AOC     | = | area of concern   | RAP  | = | Remedial Action Plan                             |
| AS      | = | aerial photograph, storage, possible temporary storage                        | RCRA | = | Resource Conservation and Recovery Act           |
| AWP     | = | (State of California Department of Water Resources) Abandoned Well Program    | RFA  | = | RCRA Facility Assessment                         |
| BCT     | = | BRAC Cleanup Team   | RI   | = | Remedial Investigation                           |
| Bldg.   | = | building  | ROD  | = | Record of Decision                               |
| BRAC    | = | Base Realignment and Closure  | RV   | = | recreational vehicle                             |
| CERCLA  | = | Comprehensive Environmental Response, Compensation, and Liability Act of 1980 | ST   | = | storage, temporary                               |
| CLEAN   | = | Comprehensive Long-Term Environmental Action Navy                             | STD  | = | storage, designated hazardous waste storage area |
| DI      | = | disposal, incinerator   | TOW  | = | treatment, oil/water separator                   |
| DWR     | = | Department of Water Resources   | UST  | = | underground storage tank                         |
| EBS     | = | Environmental Baseline Survey   | VSI  | = | visual site inspection                           |
| ESI     | = | expanded site investigation   |      |   |  |
| HMH     | = | heavy medium helicopter   |      |   |  |
| IRP     | = | Installation Restoration Program  |      |   |  |
| JP-5    | = | jet propellant grade 5  |      |   |  |
| MAG     | = | Marin Aircraft Group  |      |   |  |
| MAW     | = | miscellaneous, abandoned well   |      |   |  |
| MCAS    | = | Marine Corps Air Station  |      |   |  |
| MCD     | = | miscellaneous, crash drill site   |      |   |  |
| MMS     | = | miscellaneous, major spill  |      |   |  |
| MRR     | = | miscellaneous, rifle range  |      |   |  |
| MWA     | = | miscellaneous, wash area  |      |   |  |
| MWSS    | = | Marine Wing Support Squadron  |      |   |  |
| NBC     | = | nuclear, biological, chemical   |      |   |  |
| NFA     | = | no further action   |      |   |  |
| No.     | = | number  |      |   |  |
| OCY     | = | Osumi Corporation Yard  |      |   |  |
| OU      | = | operable unit   |      |   |  |
| O/W SEP | = | oil/water separator   |      |   |  |
| POL     | = | petroleum, oil, and lubricant   |      |   |  |

**Table 3**  
**Former UST/AST Sites**  
**Within Transfer Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40 and 41**

| UST/AST <sup>a, b</sup> | Parcel | Description <sup>c</sup>  | Status <sup>c</sup>   | Area Type <sup>c</sup> |
|-------------------------|--------|---|---|------------------------|
| UST 5                   | 1      | 7,000-gallon, steel, fuel oil UST<br><br>Installed - 1943<br><br>Removed - Prior to 1991<br><br>Excavation/backfill activities completed under RAC (DO No. 51)  | Closure Report - February 7, 1997<br><br>NFA approval - March 31, 1997 (Santa Ana RWQCB)  | 2                      |
| UST 7                   | 1      | 3,000-gallon, steel, fuel oil UST<br><br>Installed - 1943<br><br>Removed - Prior to 1991<br><br>Excavation/backfill activities completed under RAC (DO No. 51)  | Closure Report - July 15, 1997<br><br>NFA approval - August 11, 1997 (Santa Ana RWQCB)  | 2                      |
| UST 9                   | 1      | 500-gallon, steel, fuel oil UST<br><br>Installed - 1943<br><br>Removed - Prior to 1991<br><br>Excavation not required; no contaminants reported. Work conducted under RAC (DO No. 31)   | Closure report - December 13, 1996<br><br>NFA approval - January 27, 1997 (Santa Ana RWQCB)   | 1                      |
| UST 132                 | 1      | 2,000-gallon, steel, fuel oil UST<br><br>Installed - 1961<br><br>Removed - March 30, 1993<br><br>Excavation/backfill activities completed under RAC (DO No. 31)   | Closure report - December 13, 1996<br><br>NFA approval - January 27, 1997 (Santa Ana RWQCB)   | 2                      |
| UST 133 (UST 133B)      | 1      | 2,200-gallon, steel, fuel oil UST<br><br>Installed - 1961<br><br>Removed - December 12, 1997<br><br>Excavation not required; no contaminants reported. Work conducted under RAC (DO No. 31). After being located, tank re-designated UST 133B for supplemental closure and NFA approval purposes. | Closure report - December 13, 1996<br><br>NFA approval (UST 133) - January 27, 1997 (Santa Ana RWQCB)<br><br>Tank subsequently located following Closure report issuance<br><br>Supplemental Closure report - July 24, 1998<br><br>NFA approval (UST 133B) - April 13, 1999 (Santa Ana RWQCB) | 1                      |
| UST 134                 | 1      | 2,200-gallon, steel, fuel oil UST<br><br>Installed - 1961<br><br>Removed - September 1993   | Tank was determined clean closed at removal<br><br>NFA approval - June 6, 1997 (OCHCA)  | 1                      |
| UST 172A                | 1      | 3,000-gallon, steel, diesel UST<br><br>Installed - 1966<br><br>Removed - September 1993   | Tank was determined clean closed at removal<br><br>NFA approval - June 6, 1997 (OCHCA)  | 1                      |

**Table 3 (continued)**  
**Former UST/AST Sites**  
**Within Transfer Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40 and 41**

| UST/AST <sup>a, b</sup> | Parcel | Description <sup>c</sup>   | Status <sup>c</sup>   | Area Type <sup>c</sup> |
|-------------------------|--------|--|---|------------------------|
| UST 172B                | 1      | 3,000-gallon, steel, gasoline UST<br><br>Installed - 1966<br><br>Removed - September 1993  | Tank was determined clean closed at removal<br><br>NFA approval - June 6, 1997 (OCHCA)      | 1                      |
| UST 177                 | 1      | 1,000-gallon, steel, fuel oil UST<br><br>Installed - 1968<br><br>Removed - September/October 1993<br><br>Excavation not required; no contaminants reported. Work conducted under RAC (DO No. 31) | Closure report - December 13, 1996<br><br>NFA approval - January 27, 1997 (Santa Ana RWQCB) | 1                      |
| UST 184                 | 1      | 4,000-gallon, steel, fuel oil UST<br><br>Installed - 1969<br><br>Removed - September 1993  | Tank was determined clean closed at removal<br><br>NFA approval - June 6, 1997 (OCHCA)      | 1                      |
| UST 213                 | 1      | 2,000-gallon, steel, fuel oil UST<br><br>Installed - 1973<br><br>Removed - September 1993  | Tank was determined clean closed at removal<br><br>NFA approval - June 6, 1997 (OCHCA)      | 1                      |
| UST 249                 | 1      | 14,000-gallon, steel, fuel oil UST<br><br>Installed - 1984<br><br>Removed - September 1993   | Tank was determined clean closed at removal<br><br>NFA approval - June 6, 1997 (OCHCA)      | 1                      |
| UST 526A                | 1      | 580-gallon, steel, waste oil UST<br><br>Installed - 1987<br><br>Removed - January 1999<br><br>UST associated with O/W SEP-526; tank in below grade vault   | NFA approval - November 16, 2000 (BCT)  | 1                      |
| UST 526B                | 1      | 580-gallon, steel, waste oil UST<br><br>Installed - 1987<br><br>Removed - March 1999<br><br>UST associated with O/W SEP-526; tank in below grade vault   | NFA approval - November 16, 2000 (BCT)  | 1                      |
| AST 227                 | 1      | 1,750-gallon, steel, diesel AST<br><br>Removed - August 12, 1997   | Closure report - June 9, 1998<br><br>NFA approval - May 15, 2000 (Santa Ana RWQCB)          | 1                      |
| AST 526                 | 1      | 100-gallon, steel, diesel AST<br><br>Removed - April 26, 1999  | Closure report - December 7, 2000<br><br>NFA approval - January 17, 2001 (Santa Ana RWQCB). | 1                      |
| AST 540A (SAT-12)       | 28     | 5,000-gallon, steel, Moffett Trench waste AST<br><br>Removed - June 10, 1997   | Closure report - June 9, 1998<br><br>NFA approval - May 15, 2000 (Santa Ana RWQCB)          | 1                      |

**Table 3 (continued)**  
**Former UST/AST Sites**  
**Within Transfer Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40 and 41**

| UST/AST <sup>a, b</sup> | Parcel | Description <sup>c</sup>   | Status <sup>c</sup>  | Area Type <sup>c</sup> |
|-------------------------|--------|--|--|------------------------|
| AST 540B (SAT-12)       | 28     | 1,000-gallon, steel, Moffett Trench waste AST<br><br>Removed - June 10, 1997   | Closure report - June 9, 1998<br><br>NFA approval - May 15, 2000 (Santa Ana RWQCB)         | 1                      |
| UST 23C                 | 29     | 500-gallon, steel, gasoline UST<br><br>Installed - 1977<br><br>Removed - October 7, 1997<br><br>Excavation/backfill activities completed under RAC (DO No. 51) | Closure report - September 29, 1998<br><br>NFA approval - March 22, 1999 (Santa Ana RWQCB) | 2                      |

**Notes:**

- <sup>a</sup> No USTs or ASTs are located within transfer boundaries of Parcels 16, 17, 23, 24, 27, 34, 35, 36, 40, and 41
- <sup>b</sup> Known UST and AST sites in Parcels - Basewide Environmental Baseline Survey, Table 3-2 (BNI 2001a)
- <sup>c</sup> UST and AST Description, Status, and Area Type - Basewide Environmental Baseline Survey, Tables 5-5 and 5-6 (BNI 2001a)
- <sup>d</sup> Area type based upon environmental condition as defined in the Base Realignment and Closure (BRAC) Cleanup Plan Guidebook Addendum (August 1996) and subsequent site investigation data (see Table 4)

**Acronyms/Abbreviations:**

- AST = aboveground storage tank
- BCT = base realignment and closure (BRAC) Cleanup Team
- DO = delivery order
- NFA = no further action
- No. = number
- OCHCA = Orange County Health Care Agency
- O/W SEP = oil/water separator
- RAC = Remedial Action Contractor
- RWQCB = (California) Regional Water Quality Control Board
- UST = underground storage tank

**Table 4**  
**Department of Defense**  
**Environmental Condition of Property Area Types \***

| Area Type | Description   |
|-----------|---|
| 1         | Areas where no release or disposal of hazardous substances or petroleum products has occurred (including no migration of these substances from adjacent areas)                                |
| 2         | Areas where only release or disposal of petroleum products has occurred   |
| 3         | Areas where release of hazardous substances has occurred, but at concentrations that do not require a removal or remedial action  |
| 4         | Areas where release, disposal, and/or migration of hazardous substances has occurred, and all remedial actions necessary to protect human health and the environment have been taken          |
| 5         | Areas where release, disposal, and/or migration of hazardous substances has occurred, and removal or remedial actions are underway, but all required remedial actions have not yet been taken |
| 6         | Areas where release, disposal, and/or migration of hazardous substances has occurred, but required response actions have not yet been implemented   |
| 7         | Areas that have not been evaluated or require additional evaluation   |

**Note:**

- \* according to the Department of Defense BRAC Cleanup Plan Guidebook (DoD 1996), properties classified as Area Types 1 through 4 may be considered suitable for transfer, and properties classified as Area Types 5 through 7 are considered unsuitable for transfer

**Acronyms/Abbreviations:**

BRAC - base realignment and closure  
DoD - Department of Defense

**Table 5**  
**Environmental Factors Considered -**  
**Transfer Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40 and 41**

| Environmental Factors<br>May Pose Restrictions or<br>Require Notification? |     | Environmental Factors Considered                                   |
|--|-----|--|
| No   | Yes |  |
|  | X   | Hazardous substances (notification)                                |
| X  |     | Areas of concern   |
| X  |     | Medical/biohazardous wastes  |
| X  |     | Oil/ water separators  |
|  | X   | Monitoring wells/surface water gauging locations                   |
|  | X   | Unexploded ordnance  |
|  | X   | Petroleum products and derivatives                                 |
| X  |     | Radioactive & mixed wastes   |
| X  |     | Storage tanks (USTs / ASTs)  |
|  | X   | Pesticides/herbicides applications                                 |
|  | X   | Asbestos   |
| X  |     | Drinking water quality   |
| X  |     | Indoor air quality   |
|  | X   | Lead-based paint   |
|  | X   | Polychlorinated biphenyls  |
|  | X   | Radon  |
| X  |     | Air conformity/air permits   |
| X  |     | Coastal zones  |
| X  |     | Energy (utilities)   |
| X  |     | Flood plains   |
| X  |     | Groundwater use/subsurface excavation                              |
| X  |     | Hazardous waste management (by lessee)                             |
| X  |     | Historic property (archeological/Native American, paleontological) |
| X  |     | Occupational Safety & Health Administration                        |
| X  |     | Outdoor air quality  |
|  | X   | Prime/unique farmlands   |
| X  |     | Sanitary sewer systems (wastewater)                                |
| X  |     | Sensitive habitat  |
| X  |     | Septic tanks (wastewater)  |
| X  |     | Solid waste  |
| X  |     | Threatened and endangered species                                  |
| X  |     | Transportation   |
|  | X   | Wetlands   |
|  | X   | School Site Considerations   |

Acronyms/ Abbreviations:

AST - aboveground storage tank

UST - underground storage tank

**Table 6**  
**Summary of PCB Transformer Survey and PCB Equipment Inspection Results**  
**In Buildings Within Transfer Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40 and 41**

| Building (B)/<br>Structure (S) | Parcel | Proposed<br>Disposition <sup>1</sup> | Year<br>Built | Associated<br>Transformer? <sup>1</sup> | Transformer<br>Location <sup>1</sup> | Transformer<br>ID No. <sup>1</sup>  | Max PCB.<br>Content of<br>Transformer <sup>1</sup><br>(ppm) | PCB<br>Equipment<br>Inspection<br>Performed? <sup>1</sup> | Inspection<br>Report<br>Date <sup>1</sup> | PCB-<br>Containing<br>Equipment<br>Present? <sup>1</sup> | Location <sup>1</sup> | Corrective<br>Action <sup>1</sup>                     |
|--------------------------------|--------|--------------------------------------|---------------|---|--------------------------------------|---|---|---|---|--|-----------------------|---|
| B 5                            | 1      | TBD                                  | 1943          | Yes                                     | Adjacent poles                       | 72589,<br>3159600,<br>76342,<br>3159602,<br>1351318,<br>1350652,<br>1351320 | 32, 51  | Yes   | 1992                                      | No   | NA                    | Transformer<br>No. 3159602<br>with 51 ppm<br>replaced |
| S 10M                          | 1      | Unknown <sup>2</sup>                 | 1943          | No                                      | NA                                   | NA  | NA  | No  | NA  | NA   | NA                    | NA  |
| B 132                          | 1      | Reuse                                | 1961          | Yes                                     | Adjacent pad                         | 6023230   | 3   | Yes   | 1992                                      | No   | NA                    | NA  |
| B 172                          | 1      | Demolition                           | 1966          | Yes                                     | Adjacent pole                        | 7920-1,<br>7920-2,<br>7920-3  | 9   | Yes   | 1992                                      | No   | NA                    | NA  |
| B 177                          | 1      | Reuse                                | 1968          | Yes                                     | Bldg. 177                            | 88095-1   | 0   | Yes   | 1992                                      | No   | NA                    | NA  |
| B 184                          | 1      | Reuse                                | 1969          | Yes                                     | Adjacent pad                         | 85JH488192  | 1   | Yes   | 1992                                      | No   | NA                    | NA  |
| B 213                          | 1      | Reuse                                | 1970          | Yes                                     | Adjacent pad                         | 22926-001   | 0   | Yes   | 1992                                      | No   | NA                    | NA  |
| B 218                          | 1      | Reuse                                | 1976          | Yes                                     | Adjacent pad                         | 11714   | 0   | Yes   | 1992                                      | Yes  | Small<br>capacitor    | None<br>required                                      |
| B 227                          | 1      | Reuse                                | 1981          | Yes                                     | Adjacent pads                        | LS,<br>E249288-60K  | 14  | Yes   | 1992                                      | No   | NA                    | NA  |
| S 236                          | 1      | TBD                                  | 1973          | Yes                                     | On pad                               | DF11113186  | 2   | Yes   | 1992                                      | No   | NA                    | NA  |
| S 239                          | 1      | Reuse                                | 1968          | Yes                                     | On pad,<br>adjacent to<br>Bldg. 177  | 88095-1   | 0   | Yes   | 1992                                      | No   | NA                    | NA  |
| B 245                          | 1      | Reuse                                | 1984          | Yes                                     | Adjacent pad                         | PNH-0572  | 1   | Yes   | 1992                                      | No   | NA                    | NA  |
| B 246                          | 1      | Reuse                                | 1984          | No                                      | NA                                   | NA  | NA  | Yes   | 1990                                      | No   | NA                    | NA  |
| B 249                          | 1      | Reuse                                | 1984          | No                                      | NA                                   | NA  | NA  | Yes   | 1992                                      | No   | NA                    | NA  |
| B 254                          | 1      | Demolition                           | 1984          | Yes                                     | Adjacent pad                         | DF11113186<br>(see Bldg. 236),<br>Type QMS                                  | 2   | Yes   | 1992                                      | No   | NA                    | NA  |

**Table 6 (continued)**  
**Summary of PCB Transformer Survey and PCB Equipment Inspection Results**  
**In Buildings Within Transfer Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40 and 41**

| Building (B)/<br>Structure (S) | Parcel | Proposed<br>Disposition <sup>1</sup> | Year<br>Built | Associated<br>Transformer? <sup>1</sup> | Transformer<br>Location <sup>1</sup> | Transformer<br>ID No. <sup>1</sup>         | Max PCB.<br>Content of<br>Transformer <sup>1</sup><br>(ppm) | PCB<br>Equipment<br>Inspection<br>Performed? <sup>1</sup> | Inspection<br>Report<br>Date <sup>1</sup> | PCB-<br>Containing<br>Equipment<br>Present? <sup>1</sup> | Location <sup>1</sup> | Corrective<br>Action <sup>1</sup> |
|--------------------------------|--------|--------------------------------------|---------------|---|--------------------------------------|--|---|---|---|--|-----------------------|-----------------------------------|
| S 278                          | 1      | Reuse                                | 1984          | No                                      | NA                                   | NA   | NA  | No  | NA  | NA   | NA                    | NA                                |
| S 279                          | 1      | Reuse                                | 1984          | No                                      | NA                                   | NA   | NA  | No  | NA  | NA   | NA                    | NA                                |
| B 524                          | 1      | Reuse                                | 1988          | Yes                                     | Adjacent pad                         | 1439145                                    | 7   | Yes   | 1992                                      | No   | NA                    | NA                                |
| B 526                          | 1      | Reuse                                | 1988          | Yes                                     | Bldg. 526                            | 88JD131103                                 | 1   | Yes   | 1992                                      | No   | NA                    | NA                                |
| B 538                          | 1      | Reuse                                | 1989          | Yes                                     | Bldg. 538                            | 886008642                                  | 1   | Yes   | 1992                                      | No   | NA                    | NA                                |
| B 549                          | 1      | Reuse                                | 1989          | No                                      | NA                                   | NA   | NA  | Yes   | 1992                                      | No   | NA                    | NA                                |
| S 550                          | 1      | Reuse                                | 1984          | Yes                                     | On pad                               | PNH-0572                                   | 1   | Yes   | 1992                                      | No   | NA                    | NA                                |
| B 561                          | 1      | Reuse                                | 1990          | No                                      | NA                                   | NA   | NA  | Yes   | 1992                                      | No   | NA                    | NA                                |
| B 573                          | 1      | Demolition                           | 1991          | No                                      | NA                                   | NA   | NA  | No  | NA  | NA   | NA                    | NA                                |
| B 574                          | 1      | Demolition                           | 1991          | No                                      | NA                                   | NA   | NA  | No  | NA  | NA   | NA                    | NA                                |
| B 602                          | 1      | Demolition                           | 1992          | No                                      | NA                                   | NA   | NA  | No  | NA  | NA   | NA                    | NA                                |
| S 603                          | 1      | Reuse                                | 1984          | Yes                                     | On pad                               | Not identified                             | 1   | No  | NA  | NA   | NA                    | NA                                |
| B 182                          | 16, 40 | Demolition                           | 1967          | Yes                                     | On adjacent<br>pad                   | M121982YMMA,<br>M121985YMMA,<br>M12125YMMA | 0   | Yes   | 1992                                      | No   | NA                    | NA                                |
| S 241                          | 16     | Reuse                                | 1968          | Yes                                     | On pad<br>adjacent to<br>Bldg. 182   | M121982YMMA,<br>M121985YMMA,<br>M12125YMMA | 0   | Yes   | 1992                                      | No   | NA                    | NA                                |
| B 562                          | 16     | Demolition                           | 1990          | No                                      | NA                                   | NA   | NA  | Yes   | 1992                                      | No   | NA                    | NA                                |
| S 569                          | 16     | Demolition                           | 1992          | Yes                                     | Adjacent pad                         | 90-51816                                   | 0   | Yes   | 1992                                      | No   | NA                    | NA                                |
| B 584                          | 16     | Demolition                           | 1991          | No                                      | NA                                   | NA   | NA  | No  | NA  | NA   | NA                    | NA                                |
| B 590                          | 16     | Demolition                           | 1991          | No                                      | NA                                   | NA   | NA  | No  | NA  | NA   | NA                    | NA                                |
| S 592                          | 16     | Demolition                           | 1991          | No                                      | NA                                   | NA   | NA  | No  | NA  | NA   | NA                    | NA                                |
| B 597                          | 16     | Demolition                           | 1992          | No                                      | NA                                   | NA   | NA  | No  | NA  | NA   | NA                    | NA                                |
| S 607                          | 16     | Demolition                           | 1978          | No                                      | NA                                   | NA   | NA  | No  | NA  | NA   | NA                    | NA                                |
| B 162                          | 23, 40 | Demolition                           | 1965          | No                                      | NA                                   | NA   | NA  | No  | NA  | NA   | NA                    | NA                                |

**Table 6 (continued)**  
**Summary of PCB Transformer Survey and PCB Equipment Inspection Results**  
**In Buildings Within Transfer Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40 and 41**

| Building (B)/<br>Structure (S) | Parcel | Proposed<br>Disposition <sup>1</sup> | Year<br>Built | Associated<br>Transformer? <sup>1</sup> | Transformer<br>Location <sup>1</sup> | Transformer<br>ID No. <sup>1</sup> | Max PCB.<br>Content of<br>Transformer <sup>1</sup><br>(ppm) | PCB<br>Equipment<br>Inspection<br>Performed? <sup>1</sup> | Inspection<br>Report<br>Date <sup>1</sup> | PCB-<br>Containing<br>Equipment<br>Present? <sup>1</sup> | Location <sup>1</sup> | Corrective<br>Action <sup>1</sup> |
|--------------------------------|--------|--------------------------------------|---------------|---|--------------------------------------|------------------------------------|---|---|---|--|-----------------------|-----------------------------------|
| S 6798                         | 23     | Demolition                           | Unkno<br>wn   | No                                      | NA                                   | NA                                 | NA  | No  | NA  | NA   | NA                    | NA                                |
| Tustin Villas<br>Housing       | 23     | Demolition                           | 1984          | No                                      | NA                                   | NA                                 | NA  | No  | NA  | NA   | NA                    | NA                                |
| S 39                           | 27     | Demolition                           | 1943          | Yes                                     | Adjacent pad                         | 2977542                            | 2   | No  | NA  | NA   | NA                    | NA                                |
| B 23A                          | 28     | Demolition                           | 1942          | No                                      | NA                                   | NA                                 | NA  | Yes   | 1992                                      | No   | NA                    | NA                                |
| B 23B                          | 28     | Demolition                           | 1942          | No                                      | NA                                   | NA                                 | NA  | Yes   | 1992                                      | No   | NA                    | NA                                |
| B 567                          | 28     | Demolition                           | 1990          | No                                      | NA                                   | NA                                 | NA  | Yes   | 1992                                      | No   | NA                    | NA                                |
| S 10P                          | 29     | Unknown <sup>2</sup>                 | 1943          | No                                      | NA                                   | NA                                 | NA  | No  | NA  | NA   | NA                    | NA                                |
| B 23C                          | 29     | Demolition                           | 1942          | Yes                                     | Adjacent pole                        | 699928                             | 3   | Yes   | 1992                                      | No   | NA                    | NA                                |
| B 23D                          | 29     | Demolition                           | 1942          | No                                      | NA                                   | NA                                 | NA  | Yes   | 1992                                      | No   | NA                    | NA                                |
| B 23E                          | 29     | Demolition                           | 1942          | No                                      | NA                                   | NA                                 | NA  | Yes   | 1992                                      | No   | NA                    | NA                                |
| B 23F                          | 29     | Demolition                           | 1942          | No                                      | NA                                   | NA                                 | NA  | Yes   | 1992                                      | No   | NA                    | NA                                |
| S 6168                         | 29     | Demolition                           | Unkno<br>wn   | No                                      | NA                                   | NA                                 | NA  | Yes   | 1992                                      | No   | NA                    | NA                                |
| S 6480                         | 34, 40 | Demolition                           | Unkno<br>wn   | No                                      | NA                                   | NA                                 | NA  | Yes   | 1992                                      | No   | NA                    | NA                                |
| S 6877                         | 34     | Unknown <sup>2</sup>                 | 1992          | No                                      | NA                                   | NA                                 | NA  | No  | NA  | NA   | NA                    | NA                                |
| S 6878                         | 34     | Unknown <sup>2</sup>                 | 1992          | No                                      | NA                                   | NA                                 | NA  | No  | NA  | NA   | NA                    | NA                                |
| S 6879                         | 34     | Unknown <sup>2</sup>                 | 1992          | No                                      | NA                                   | NA                                 | NA  | No  | NA  | NA   | NA                    | NA                                |
| S 6880                         | 34     | Unknown <sup>2</sup>                 | 1992          | No                                      | NA                                   | NA                                 | NA  | No  | NA  | NA   | NA                    | NA                                |
| Irvine Park<br>North Housing   | 34     | Demolition                           | 1979,<br>1982 | No                                      | NA                                   | NA                                 | NA  | No  | NA  | NA   | NA                    | NA                                |
| S 215                          | 35     | TBD                                  | 1966          | No                                      | NA                                   | NA                                 | NA  | No  | NA  | NA   | NA                    | NA                                |
| B 6873                         | 35     | Unknown <sup>2</sup>                 | 1992          | Yes                                     | Adjacent pole                        | 69VJ039024                         | 1   | No  | NA  | NA   | NA                    | NA                                |
| S 6874                         | 35     | Unknown <sup>2</sup>                 | 1992          | No                                      | NA                                   | NA                                 | NA  | No  | NA  | NA   | NA                    | NA                                |
| S 6875                         | 35     | Unknown <sup>2</sup>                 | 1992          | No                                      | NA                                   | NA                                 | NA  | No  | NA  | NA   | NA                    | NA                                |

**Table 6 (continued)**  
**Summary of PCB Transformer Survey and PCB Equipment Inspection Results**  
**In Buildings Within Transfer Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40 and 41**

| Building (B)/<br>Structure (S) | Parcel | Proposed<br>Disposition <sup>1</sup> | Year<br>Built | Associated<br>Transformer? <sup>1</sup> | Transformer<br>Location <sup>1</sup> | Transformer<br>ID No. <sup>1</sup> | Max PCB.<br>Content of<br>Transformer <sup>1</sup><br>(ppm) | PCB<br>Equipment<br>Inspection<br>Performed? <sup>1</sup> | Inspection<br>Report<br>Date <sup>1</sup> | PCB-<br>Containing<br>Equipment<br>Present? <sup>1</sup> | Location <sup>1</sup> | Corrective<br>Action <sup>1</sup> |
|--------------------------------|--------|--------------------------------------|---------------|---|--------------------------------------|------------------------------------|---|---|---|--|-----------------------|-----------------------------------|
| S 6876                         | 35     | Unknown <sup>2</sup>                 | 1992          | No                                      | NA                                   | NA                                 | NA  | No  | NA  | NA   | NA                    | NA                                |
| Moffett<br>Meadows<br>Housing  | 35     | Demolition                           | 1964          | No                                      | NA                                   | NA                                 | NA  | No  | NA  | NA   | NA                    | NA                                |
| Irvine Park<br>South Housing   | 36     | Demolition                           | 1981,<br>1982 | No                                      | NA                                   | NA                                 | NA  | No  | NA  | NA   | NA                    | NA                                |
| B 516                          | 40, 1  | Demolition                           | 1986          | No                                      | NA                                   | NA                                 | NA  | Yes   | 1992                                      | No   | NA                    | NA                                |
| B 3002T                        | 40     | Demolition                           | Unkno<br>wn   | No                                      | NA                                   | NA                                 | NA  | No  | NA  | NA   | NA                    | NA                                |

Notes

<sup>1</sup> Source – Basewide Environmental Baseline Survey, Table B-2 (BNI 2001a)

<sup>2</sup> Proposed disposition not specified in reuse plan

Acronyms/Abbreviations:

Bldg. = building  
Max = maximum  
ID = identification  
NA = not applicable  
No. = number  
PCB = polychlorinated biphenyl  
ppm = parts per million  
TBD = to be determined

**Table 7**  
**Summary of ACM Survey Results**  
**In Buildings Within Transfer Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40 and 41**

| Building (B)/<br>Structure (S) | Parcel | Proposed<br>Disposition <sup>1</sup> | Year Built | ACM Survey<br>Performed? <sup>1</sup> | Survey<br>Report Date <sup>1</sup> | ACM<br>Found? <sup>1</sup> | Location <sup>1</sup>  | Type Condition <sup>1</sup>   |
|--------------------------------|--------|--------------------------------------|------------|---------------------------------------|------------------------------------|----------------------------|--|---|
| B 5                            | 1      | TBD                                  | 1943       | Yes                                   | 1988, 2001                         | Yes                        | Pipe insulation (1988); hard thermal insulation and floor tile (12" x 12") (2001)          | FAD ACM - insulation and tile (2001)  |
| S 10M                          | 1      | Unknown <sup>2</sup>                 | 1943       | No                                    | NA                                 | NA                         |  |   |
| B 132                          | 1      | Reuse                                | 1961       | Yes                                   | 1991, 2001                         | Yes, No                    | Floor tile, pipe insulation, roofing (1991)  | Non-friable; No FAD ACM (2001)  |
| B 172                          | 1      | Demolition                           | 1966       | Yes                                   | 1991                               | Yes                        | Floor tile, roofing  | Non-friable   |
| B 177                          | 1      | Reuse                                | 1968       | Yes                                   | 1988, 2001                         | Yes, No                    | Spray-on acoustical ceiling insulation, and elbow insulation (1988)                        | Friable (ceiling insulation)/ significantly damaged (1988); No FAD ACM (2001)                     |
| B 184                          | 1      | Reuse                                | 1969       | Yes                                   | 1991, 2001                         | Yes, No                    | Floor tile, gasket material, roofing, and pipe insulation (1991)                           | Friable (pipe insulation, gasket material)/damaged (1991); No FAD ACM (2001)                      |
| B 213                          | 1      | Reuse                                | 1973       | Yes                                   | 1988, 2001                         | Yes                        | Spray-applied acoustical ceiling insulation and tile (1988), drywall/joint compound (2001) | Friable ceiling insulation/ good (1988); FAD ACM (drywall/compound) (2001); FAD ACM abated (2002) |
| B 218                          | 1      | Reuse                                | 1976       | Yes                                   | 1997                               | Yes                        | Joint compound, spray-applied acoustical material, carpet mastic                           | Friable (joint compound, acoustical material)/good  |
| B 227                          | 1      | Reuse                                | 1981       | Yes                                   | 1988, 2001                         | Yes, No                    | Transite panels and floor tiles (1988)   | No FAD ACM (2001)   |
| S 236                          | 1      | TBD                                  | 1973       | No                                    | NA                                 | NA                         |  |   |
| S 239                          | 1      | Reuse                                | 1968       | No                                    | NA                                 | NA                         |  |   |
| B 245                          | 1      | Reuse                                | 1984       | No                                    | NA                                 | NA                         |  |   |
| B 246                          | 1      | Reuse                                | 1984       | No                                    | NA                                 | NA                         |  |   |
| B 249                          | 1      | Reuse                                | 1984       | No                                    | NA                                 | NA                         |  |   |
| B 254                          | 1      | Demolition                           | 1984       | No                                    | NA                                 | NA                         |  |   |
| S 278                          | 1      | Reuse                                | 1984       | No                                    | NA                                 | NA                         |  |   |
| S 279                          | 1      | Reuse                                | 1984       | No                                    | NA                                 | NA                         |  |   |

**Table 7 (continued)**  
**Summary of ACM Survey Results**  
**In Buildings Within Transfer Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40 and 41**

| Building (B)/<br>Structure (S) | Parcel | Proposed<br>Disposition <sup>1</sup> | Year Built | ACM Survey<br>Performed? <sup>1</sup> | Survey<br>Report Date <sup>1</sup> | ACM<br>Found? <sup>1</sup> | Location <sup>1</sup> | Type Condition <sup>1</sup> |
|--------------------------------|--------|--------------------------------------|------------|---------------------------------------|------------------------------------|----------------------------|-----------------------|-----------------------------|
| B 524                          | 1      | Reuse                                | 1988       | No                                    | NA                                 | NA                         |                       |                             |
| B 526                          | 1      | Reuse                                | 1988       | No                                    | NA                                 | NA                         |                       |                             |
| B 538                          | 1      | Reuse                                | 1989       | No                                    | NA                                 | NA                         |                       |                             |
| B 549                          | 1      | Reuse                                | 1989       | No                                    | NA                                 | NA                         |                       |                             |
| S 550                          | 1      | Reuse                                | 1984       | No                                    | NA                                 | NA                         |                       |                             |
| B 561                          | 1      | Reuse                                | 1990       | No                                    | NA                                 | NA                         |                       |                             |
| B 573                          | 1      | Demolition                           | 1991       | No                                    | NA                                 | NA                         |                       |                             |
| B 574                          | 1      | Demolition                           | 1991       | No                                    | NA                                 | NA                         |                       |                             |
| B 602                          | 1      | Demolition                           | 1992       | No                                    | NA                                 | NA                         |                       |                             |
| S 603                          | 1      | Reuse                                | 1984       | No                                    | NA                                 | NA                         |                       |                             |
| B 182                          | 16, 40 | Demolition                           | 1967       | Yes                                   | 1991                               | Yes                        | Roofing               | Non-friable                 |
| S 241                          | 16     | Reuse                                | 1968       | No                                    | NA                                 | NA                         |                       |                             |
| B 562                          | 16     | Demolition                           | 1990       | No                                    | NA                                 | NA                         |                       |                             |
| S 569                          | 16     | Demolition                           | 1991       | No                                    | NA                                 | NA                         |                       |                             |
| B 584                          | 16     | Demolition                           | 1991       | No                                    | NA                                 | NA                         |                       |                             |
| B 590                          | 16     | Demolition                           | 1991       | No                                    | NA                                 | NA                         |                       |                             |
| B 592                          | 16     | Demolition                           | 1991       | No                                    | NA                                 | NA                         |                       |                             |
| B 597                          | 16     | Demolition                           | 1992       | No                                    | NA                                 | NA                         | NA                    |                             |
| S 607                          | 16     | Demolition                           | 1978       | No                                    | NA                                 | NA                         |                       |                             |
| B 162                          | 23, 40 | Demolition                           | 1965       | No                                    | NA                                 | NA                         |                       |                             |
| S 6798                         | 23     | Demolition                           | Unknown    | No                                    | NA                                 | NA                         |                       |                             |
| Tustin Villas<br>Housing       | 23     | Demolition                           | 1984       | Yes                                   | 1995                               | No                         |                       |                             |
| S 39                           | 27     | Demolition                           | 1943       | No                                    | NA                                 | NA                         |                       |                             |
| B 23A                          | 28     | Demolition                           | 1942       | Yes                                   | 1991                               | No                         |                       |                             |
| B 23B                          | 28     | Demolition                           | 1942       | Yes                                   | 1991                               | No                         |                       |                             |

**Table 7 (continued)**  
**Summary of ACM Survey Results**  
**In Buildings Within Transfer Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40 and 41**

| Building (B)/<br>Structure (S) | Parcel | Proposed<br>Disposition <sup>1</sup> | Year Built | ACM Survey<br>Performed? <sup>1</sup> | Survey<br>Report Date <sup>1</sup> | ACM<br>Found? <sup>1</sup> | Location <sup>1</sup>  | Type Condition <sup>1</sup>      |
|--------------------------------|--------|--------------------------------------|------------|---------------------------------------|------------------------------------|----------------------------|--|----------------------------------|
| B 567                          | 28     | Demolition                           | 1990       | No                                    | NA                                 | NA                         |  |                                  |
| S 10P                          | 29     | Unknown <sup>2</sup>                 | 1943       | No                                    | NA                                 | NA                         |  |                                  |
| B 23C                          | 29     | Demolition                           | 1942       | Yes                                   | 1991                               | No                         |  |                                  |
| B 23D                          | 29     | Demolition                           | 1942       | Yes                                   | 1991                               | Yes                        | Roofing  | Non-friable                      |
| B 23E                          | 29     | Demolition                           | 1942       | Yes                                   | 1991                               | No                         |  |                                  |
| B 23F                          | 29     | Demolition                           | 1942       | Yes                                   | 1991                               | Yes                        | Roofing  | Non-friable                      |
| S 6168                         | 29     | Demolition                           | Unknown    | No                                    | NA                                 | NA                         |  |                                  |
| S 6480                         | 34, 40 | Demolition                           | Unknown    | No                                    | NA                                 | NA                         |  |                                  |
| S 6877                         | 34     | Unknown <sup>2</sup>                 | 1992       | No                                    | NA                                 | NA                         |  |                                  |
| S 6878                         | 34     | Unknown <sup>2</sup>                 | 1992       | No                                    | NA                                 | NA                         |  |                                  |
| S 6879                         | 34     | Unknown <sup>2</sup>                 | 1992       | No                                    | NA                                 | NA                         |  |                                  |
| S 6880                         | 34     | Unknown <sup>2</sup>                 | 1992       | No                                    | NA                                 | NA                         |  |                                  |
| Irvine Park North<br>Housing   | 34     | Demolition                           | 1979, 1982 | Yes                                   | 1995                               | Yes                        | Floor tile/mastic  | Non-friable/good                 |
| S 215                          | 35     | TBD                                  | 1966       | No                                    | NA                                 | NA                         |  |                                  |
| B 6873                         | 35     | Unknown <sup>2</sup>                 | 1992       | No                                    | NA                                 | NA                         |  |                                  |
| S 6874                         | 35     | Unknown <sup>2</sup>                 | 1992       | No                                    | NA                                 | NA                         |  |                                  |
| S 6875                         | 35     | Unknown <sup>2</sup>                 | 1992       | No                                    | NA                                 | NA                         |  |                                  |
| S 6876                         | 35     | Unknown <sup>2</sup>                 | 1992       | No                                    | NA                                 | NA                         |  |                                  |
| Moffett Meadows<br>Housing     | 35     | Demolition                           | 1964       | Yes                                   | 1995                               | Yes                        | Paper tape/wrap on HVAC duct in<br>attic, linoleum, transite furnace<br>door (assumed) | Friable/good<br>Non-friable/good |
| Irvine Park South<br>Housing   | 36     | Demolition                           | 1981, 1982 | Yes                                   | 1995                               | Yes                        | Floor tile/mastic  | Non-friable/good                 |
| B 516                          | 40, 1  | Demolition                           | 1986       | No                                    | NA                                 | NA                         |  |                                  |
| B 3002T                        | 40     | Demolition                           | Unknown    | No                                    | NA                                 | NA                         |  |                                  |

**Table 7 (continued)**  
**Summary of ACM Survey Results**  
**In Buildings Within Transfer Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40 and 41**

**Notes:**

<sup>1</sup> Source -- Basewide Environmental Baseline Survey, Table B-3 (BNI 2001a)

<sup>2</sup> Proposed disposition not specified in reuse plan

**Acronyms/Abbreviations:**

ACM = asbestos-containing material  
FAD = friable, accessible, and damaged  
NA = not applicable  
TBD = to be determined

**Table 8**  
**Monitoring Wells and Surface Water Gauging Locations**  
**Within Transfer Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40 and 41**

| Monitoring Well/<br>Gauging Location | Parcel | Monitoring<br>Frequency <sup>c,d</sup> |
|--------------------------------------|--------|--|
| 222MW07D <sup>a</sup>                | 1      | Quarterly                              |
| 222MW07D2 <sup>a</sup>               | 1      | Quarterly                              |
| 222MW07D3 <sup>a</sup>               | 1      | Quarterly                              |
| A000SB53D <sup>a</sup>               | 27     | Quarterly                              |
| A000SB52S <sup>a</sup>               | 27     | Quarterly                              |
| A000SB54D2 <sup>a</sup>              | 27     | Quarterly                              |
| BSW11 <sup>b</sup>                   | 27     | Quarterly                              |
| I001BC43S <sup>a</sup>               | 28     | Quarterly                              |
| I001MW43D <sup>a</sup>               | 28     | Quarterly                              |
| I001BC47S <sup>a</sup>               | 28     | Quarterly                              |
| I001MW47D <sup>a</sup>               | 28     | Quarterly                              |
| BMW06S <sup>a</sup>                  | 29, 40 | Quarterly                              |
| 1SW06 <sup>b</sup>                   | 41     | Quarterly                              |

Notes:

- <sup>a</sup> Monitoring well
- <sup>b</sup> Surface water gauging station
- <sup>c</sup> Monitoring may include taking surface/groundwater level measurements and/or sampling
- <sup>d</sup> Monitoring frequency - Fall 2001 Quarterly Groundwater Monitoring Data Summary (BNI 2002)

**Table 9**  
**Notifications and Restrictions Summary**  
**for Transfer Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40, and 41**

| Parcel No. | Environmental Factor | Notification/Restriction  |
|------------|----------------------|---|
| ALL        | Access               | Pursuant to CERCLA Section 120(h)(3)(A)(iii), the deed shall reserve and the transferee shall grant to the United States an appropriate right of access to enable the United States and others to enter Parcels 23, 29, 34, 35, and 36, and portions of 1, 16, 17, 24, 27, 28, 40, and 41 in any case which remedial action or corrective action is found to be necessary on the parcels or adjacent property after the date of property transfer.  |
| 1          | PCBs                 | <p>Fluorescent light fixtures that may contain small amounts of PCBs may be in buildings on this parcel. If the transferee plans to dispose of fluorescent light ballast containing more than 3 pounds of PCB fluid, the PCB small capacitors in those light ballasts should be processed as regulated items.</p> <p>A small capacitor, potentially containing PCBs, was found in Building 218 (located on this parcel). Corrective action was not conducted because observation and/or sampling were not possible without dismantling the motor and destroying the capacitor. However, small capacitors may contain PC-impregnated solid insulation. If the transferee plans to dispose of any equipment containing more than 50 ppm impregnated solid PCB, the PCB small capacitors in the motors should be processed as regulated items. PCB-containing equipment may also be subject to State hazardous waste laws regulating PCB waste.</p>  |
| 1          | Wetlands             | Portions of this parcel consist of drainage facilities designated as jurisdictional wetlands, including vegetated or seasonal wetlands. Development by the transferee in wetland areas will require Section 404 (Clean Water Act) permits.  |
| 1          | ACM                  | <p>Copies of the ACM survey reports for buildings/structures in this parcel will be included in the transfer documentation. Buildings restricted based on ACM FAD hazards may be occupied on an interim basis if the transferee conducts the necessary ACM surveys and abatement according to all local, state, and federal requirements.</p> <p>Buildings 5, 172, 254, 516, 573, 574, and 602, and Structures 10M and 236 (scheduled for demolition or "to be determined") are restricted from occupancy. The deed will indicate that the transferee assumes responsibility for the management of ACM, including the removal and/or management of ACM prior to or during demolition, in accordance with applicable laws.</p> <p>Buildings 245, 246, 249, 524, 526, 538, 549, and 561 (scheduled for reuse) will be restricted from occupancy until the necessary surveys and abatement in accordance with all local, state, and federal requirements.</p> <p>Structures 239, 278, 279, 550, and 603 (scheduled for reuse) may be transferred without restrictions for occupancy due to ACM because they are not designed for human occupancy.</p> <p>Buildings 132, 177, 184, 213, 218, and 227 (scheduled for reuse) will not be restricted from occupancy; however if any ACM is detected in the building, the transferee must assume responsibility for the management of such ACM.</p> |

**Table 9 (continued)**  
**Notifications and Restrictions Summary**  
**for Transfer Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40, and 41**

| Parcel No. | Environmental Factor | Notification/Restriction   |
|------------|----------------------|--|
| 1          | LBP                  | <p>Copies of the LBP survey reports for buildings/structures in this parcel will be included in the transfer documentation. Buildings restricted based on LBP hazards may be occupied on an interim basis if the transferee conducts the necessary LBP surveys and abatement according to all local, state, and federal requirements.</p> <p>Buildings 132, 177, 184, 213, and 218 (scheduled for reuse and built prior to 1978) are restricted from residential use and children will not be allowed to occupy these buildings.</p> <p>Buildings 5 and 172 (disposition "to be determined" and demolition, respectively, and built prior to 1978) are restricted from residential use and children will not be allowed to occupy these buildings. The transferee will be required to demolish the buildings in accordance with applicable laws and conduct post-demolition sampling and abatement of soil-lead hazards prior to occupation.</p> <p>Structures 10M, 236, and 239 (disposition "to be determined" and reuse, and built prior to 1978) may be transferred without restrictions for occupancy due to LBP because these structures do not have painted surfaces (or limited amounts).</p> <p>Buildings 227, 245, 246, 249, 254, 524, 526, 538, 549, 561, 573, 574, and 602, and Structures 278, 279, 550, and 603 (built after 1978) may be transferred without restrictions for occupancy due to LBP.</p> |
| 1          | School Sites         | Should the subject parcel be considered for the proposed acquisition and/or construction of school properties utilizing state funding, a separate environmental review process in compliance with the CEC section 17210 et seq. will need to be conducted and approved by the Department of Toxic Substances Control (School Property Evaluation and Cleanup Division).  |
| 1          | Well Access          | Access to groundwater monitoring wells 222MW07D, 222MW07D2, and 222MW07D3 will be required after transfer. These monitoring wells and their associated equipment shall not be altered, disturbed, or removed without the prior review and written approval of DON and the BCT.   |
| 16         | PCBs                 | Fluorescent light fixtures that may contain small amounts of PCBs may be in buildings on this parcel. If the transferee plans to dispose of fluorescent light ballast containing more than 3 pounds of PCB fluid, the PCB small capacitors in those light ballasts should be processed as regulated items.   |

**Table 9 (continued)**  
**Notifications and Restrictions Summary**  
**for Transfer Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40, and 41**

| Parcel No. | Environmental Factor | Notification/Restriction   |
|------------|----------------------|--|
| 16         | ACM                  | <p>Copies of the ACM survey reports for buildings/structures in this parcel will be included in the transfer documentation. Buildings restricted based on ACM FAD hazards may be occupied on an interim basis if the transferee conducts the necessary ACM surveys and abatement according to all local, state, and federal requirements.</p> <p>Buildings 562, 584, 590, and 597 and Structures 569, 592, and 607 (scheduled for demolition) are restricted from occupancy. The deed will indicate that the transferee assumes responsibility for the management of ACM, including the removal and/or management of ACM prior to or during demolition, in accordance with applicable laws.</p> <p>Building 182 (scheduled for demolition) will not be restricted from occupancy; however if any ACM is detected in the building, the transferee must assume responsibility for the management of such ACM, including the removal and/or management of ACM prior to or during demolition.</p> <p>Structure 241 (scheduled for reuse) may be transferred without restrictions for occupancy due to ACM because they are not designed for human occupancy.</p> |
| 16         | LBP                  | <p>Copies of the LBP survey reports for buildings/structures in this parcel will be included in the transfer documentation. Buildings restricted based on LBP hazards may be occupied on an interim basis if the transferee conducts the necessary LBP surveys and abatement according to all local, state, and federal requirements.</p> <p>Structure 241 (scheduled for reuse, and built prior to 1978) may be transferred without restrictions for occupancy due to LBP because this structure does not have painted surfaces (or limited amounts).</p> <p>Building 182 (scheduled for demolition and built prior to 1978) is restricted from residential use and children will not be allowed to occupy this building. The transferee will be required to demolish the building in accordance with applicable laws and conduct post-demolition sampling and abatement of soil-lead hazards prior to occupation.</p> <p>Buildings 562, 584, 590, and 597, and Structures 569, 592, and 607 (built after 1978) may be transferred without restrictions for occupancy due to LBP.</p>   |
| 16         | Prime Farmland       | Prime farmland is located on this parcel. According to the final MCAS Tustin EIS/EIR, no mitigation measures are required.   |
| 17         | Pesticides           | The 1992 PEA sampling and risk assessment and the 1996 pesticide investigation indicated that the property was suitable for unrestricted, residential use. At the time of transfer, DON will provide the transferee with documentation regarding past pesticide use on the property as well as a copy of the PEA Report and the Pesticide Investigation Report.  |
| 17         | Prime Farmland       | Prime farmland is located on this parcel. According to the final MCAS Tustin EIS/EIR, no mitigation measures are required.   |

Table 9 (continued)  
 Notifications and Restrictions Summary  
 for Transfer Parcels 23, 29, 34, 35, and 36, and  
 Portions of 1, 16, 17, 24, 27, 28, 40, and 41

| Parcel No. | Environmental Factor | Notification/Restriction  |
|------------|----------------------|---|
| 17         | School Sites         | Should the subject parcel be considered for the proposed acquisition and/or construction of school properties utilizing state funding, a separate environmental review process in compliance with the CEC section 17210 et.seq. will need to be conducted and approved by the Department of Toxic Substances Control (School Property Evaluation and Cleanup Division).   |
| 23         | PCBs                 | Fluorescent light fixtures that may contain small amounts of PCBs may be in buildings on this parcel. If the transferee plans to dispose of fluorescent light ballast containing more than 3 pounds of PCB fluid, the PCB small capacitors in those light ballasts should be processed as regulated items.  |
| 23         | Radon                | Radon testing was conducted in 1991 at a representative number of residential buildings. No radon readings were measured above the U.S. EPA guidance level of 4 pCi/L.  |
| 23         | ACM                  | <p>Copies of the ACM survey reports for buildings/structures in this parcel will be included in the transfer documentation. Buildings restricted based on ACM FAD hazards may be occupied on an interim basis if the transferee conducts the necessary ACM surveys and abatement according to all local, state, and federal requirements.</p> <p>Building 162 and Structure 6798 (scheduled for demolition) are restricted from occupancy. The deed will indicate that the transferee assumes responsibility for the management of ACM, including the removal and/or management of ACM prior to or during demolition, in accordance with applicable laws.</p> <p>The Tustin Villas Housing (scheduled for demolition) will not be restricted from occupancy; however if any ACM is detected in the residential buildings, the transferee must assume responsibility for the management of such ACM, including the removal and/or management of ACM prior to or during demolition.</p> |
| 23         | LBP                  | <p>Copies of the LBP survey reports for buildings/structures in this parcel will be included in the transfer documentation. Buildings restricted based on LBP hazards may be occupied on an interim basis if the transferee conducts the necessary LBP surveys and abatement according to all local, state, and federal requirements.</p> <p>Building 162 (scheduled for demolition and built prior to 1978) is restricted from residential use and children will not be allowed to occupy this building.</p> <p>Structure 6798 (scheduled for demolition, and with an unknown construction date) may be transferred without restrictions for occupancy due to LBP because this structure does not have painted surfaces (or limited amounts).</p> <p>Tustin Villas residential buildings (built after 1978) may be transferred without restrictions for occupancy due to LBP.</p>  |

Table 9 (continued)  
 Notifications and Restrictions Summary  
 for Transfer Parcels 23, 29, 34, 35, and 36, and  
 Portions of 1, 16, 17, 24, 27, 28, 40, and 41

| Parcel No. | Environmental Factor | Notification/Restriction   |
|------------|----------------------|--|
| 24         | Pesticides           | The 1992 PEA sampling and risk assessment and the 1996 pesticide investigation indicated that the property was suitable for unrestricted, residential use. At the time of transfer, DON will provide the transferee with documentation regarding past pesticide use on the property as well as a copy of the PEA Report and the Pesticide Investigation Report.  |
| 24         | Prime Farmland       | Prime farmland is located on this parcel. According to the final MCAS Tustin EIS/EIR, no mitigation measures are required.   |
| 24         | Unexploded Ordnance  | A former skeet range was located on this parcel. According to the IRP-2 Remedial Investigation, no further action is necessary for this site.  |
| 27         | Pesticides           | The 1992 PEA sampling and risk assessment and the 1996 pesticide investigation indicated that the property was suitable for unrestricted, residential use. At the time of transfer, DON will provide the transferee with documentation regarding past pesticide use on the property as well as a copy of the PEA Report and the Pesticide Investigation Report.  |
| 27         | PCBs                 | Fluorescent light fixtures that may contain small amounts of PCBs may be in buildings on this parcel. If the transferee plans to dispose of fluorescent light ballast containing more than 3 pounds of PCB fluid, the PCB small capacitors in those light ballasts should be processed as regulated items.   |
| 27         | Wetlands             | Portions of this parcel consist of drainage facilities designated as jurisdictional wetlands. Development by the transferee in wetland areas will require Section 404 (Clean Water Act) permits.   |
| 27         | Prime Farmland       | Prime farmland is located on this parcel. According to the final MCAS Tustin EIS/EIR, no mitigation measures are required.   |
| 27         | ACM                  | Copies of the ACM survey reports for buildings/structures in this parcel will be included in the transfer documentation. Buildings restricted based on ACM FAD hazards may be occupied on an interim basis if the transferee conducts the necessary ACM surveys and abatement according to all local, state, and federal requirements.<br><br>Structure 39 (scheduled for demolition) is restricted from occupancy. The deed will indicate that the transferee assumes responsibility for the management of ACM, including the removal and/or management of ACM prior to or during demolition, in accordance with applicable laws. |
| 27         | LBP                  | Copies of the LBP survey reports for buildings/structures in this parcel will be included in the transfer documentation. Buildings restricted based on LBP hazards may be occupied on an interim basis if the transferee conducts the necessary LBP surveys and abatement according to all local, state, and federal requirements.<br><br>Structure 39 (scheduled for demolition, and built prior to 1978) may be transferred without restrictions for occupancy due to LBP because this structure does not have painted surfaces (or limited amounts).  |

**Table 9 (continued)**  
**Notifications and Restrictions Summary**  
**for Transfer Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40, and 41**

| Parcel No. | Environmental Factor | Notification/Restriction  |
|------------|----------------------|---|
| 27         | Well Access          | Access to groundwater monitoring wells A000SB53D, A000SB52S, and A000SB54D2 and surface water gauging location BSW11 will be required after property transfer. These monitoring wells, surface water gauging location and their associated equipment shall not be altered, disturbed, or removed without the prior review and written approval of DON and the BCT.  |
| 28         | Pesticides           | The 1992 PEA sampling and risk assessment and the 1996 pesticide investigation indicated that the property was suitable for unrestricted, residential use. At the time of transfer, DON will provide the transferee with documentation regarding past pesticide use on the property as well as a copy of the PEA Report and the Pesticide Investigation Report.   |
| 28         | PCBs                 | Fluorescent light fixtures that may contain small amounts of PCBs may be in buildings on this parcel. If the transferee plans to dispose of fluorescent light ballast containing more than 3 pounds of PCB fluid, the PCB small capacitors in those light ballasts should be processed as regulated items.  |
| 28         | Wetlands             | Portions of this parcel consist of drainage facilities designated as jurisdictional wetlands. Development by the transferee in wetland areas will require Section 404 (Clean Water Act) permits.  |
| 28         | Prime Farmland       | Prime farmland is located on this parcel. According to the final MCAS Tustin EIS/EIR, no mitigation measures are required.  |
| 28         | ACM                  | <p>Copies of the ACM survey reports for buildings/structures in this parcel will be included in the transfer documentation. Buildings restricted based on ACM FAD hazards may be occupied on an interim basis if the transferee conducts the necessary ACM surveys and abatement according to all local, state, and federal requirements.</p> <p>Building 567 (scheduled for demolition) is restricted from occupancy. The deed will indicate that the transferee assumes responsibility for the management of ACM, including the removal and/or management of ACM prior to or during demolition, in accordance with applicable laws.</p> <p>Buildings 23A and 23B (scheduled for demolition) will not be restricted from occupancy; however if any ACM is detected in the buildings, the transferee must assume responsibility for the management of such ACM, including the removal and/or management of ACM prior to or during demolition.</p> |

**Table 9 (continued)**  
**Notifications and Restrictions Summary**  
**for Transfer Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40, and 41**

| Parcel No. | Environmental Factor | Notification/Restriction   |
|------------|----------------------|--|
| 28         | LBP                  | <p>Copies of the LBP survey reports for buildings/structures in this parcel will be included in the transfer documentation. Buildings restricted based on LBP hazards may be occupied on an interim basis if the transferee conducts the necessary LBP surveys and abatement according to all local, state, and federal requirements.</p> <p>Buildings 23A and 23B (scheduled for demolition and built prior to 1978) are restricted from residential use and children will not be allowed to occupy this building. The transferee will be required to demolish the buildings in accordance with applicable laws and conduct post-demolition sampling and abatement of soil-lead hazards prior to occupation.</p> <p>Building 567 (built after 1978) may be transferred without restrictions for occupancy due to LBP.</p> |
| 28         | Well Access          | Access to groundwater monitoring wells I001BC43S, I001MW43D, I001BC47S, and I001MW47D will be required after property transfer. These monitoring wells and their associated equipment shall not be altered, disturbed, or removed without the prior review and written approval of DON and the BCT.  |
| 28         | Unexploded Ordnance  | The safety arc of a former pistol/rifle range was located on this parcel. According to the IRP-2 Remedial Investigation, no further action is necessary for this site.   |
| 29         | Pesticides           | The 1992 PEA sampling and risk assessment and the 1996 pesticide investigation indicated that the property was suitable for unrestricted, residential use. At the time of transfer, DON will provide the transferee with documentation regarding past pesticide use on the property as well as a copy of the PEA Report and the Pesticide Investigation Report.  |
| 29         | PCBs                 | Fluorescent light fixtures that may contain small amounts of PCBs may be in buildings on this parcel. If the transferee plans to dispose of fluorescent light ballast containing more than 3 pounds of PCB fluid, the PCB small capacitors in those light ballasts should be processed as regulated items.   |
| 29         | Prime Farmland       | Prime farmland is located on this parcel. According to the final MCAS Tustin EIS/EIR, no mitigation measures are required.   |

**Table 9 (continued)**  
**Notifications and Restrictions Summary**  
**for Transfer Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40, and 41**

| Parcel No. | Environmental Factor | Notification/Restriction  |
|------------|----------------------|---|
| 29         | ACM                  | <p>Copies of the ACM survey reports for buildings/structures in this parcel will be included in the transfer documentation. Buildings restricted based on ACM FAD hazards may be occupied on an interim basis if the transferee conducts the necessary ACM surveys and abatement according to all local, state, and federal requirements.</p> <p>Structures 10P and 6168 (scheduled for demolition) are restricted from occupancy. The deed will indicate that the transferee assumes responsibility for the management of ACM, including the removal and/or management of ACM prior to or during demolition, in accordance with applicable laws.</p> <p>Buildings 23C, 23D, 23E, and 23F (scheduled for demolition) will not be restricted from occupancy; however if any ACM is detected in the buildings, the transferee must assume responsibility for the management of such ACM, including the removal and/or management of ACM prior to or during demolition.</p>                          |
| 29         | LBP                  | <p>Copies of the LBP survey reports for buildings/structures in this parcel will be included in the transfer documentation. Buildings restricted based on LBP hazards may be occupied on an interim basis if the transferee conducts the necessary LBP surveys and abatement according to all local, state, and federal requirements.</p> <p>Buildings 23C, 23D, 23E, and 23F (scheduled for demolition and built prior to 1978) are restricted from residential use and children will not be allowed to occupy this building. The transferee will be required to demolish the buildings in accordance with applicable laws and conduct post-demolition sampling and abatement of soil-lead hazards prior to occupation.</p> <p>Structures 10P and 6168 (scheduled for demolition, and built prior to 1978 or with an unknown construction date) may be transferred without restrictions for occupancy due to LBP because this structure does not have painted surfaces (or limited amounts).</p> |
| 29         | Well Access          | Access to monitoring well BMW06S will be required after property transfer. This monitoring well and its associated equipment shall not be altered, disturbed, or removed without the prior review and written approval of DON and the BCT.  |
| 34         | Radon                | Radon testing was conducted in 1991 at a representative number of residential buildings. No radon readings were measured above the U.S. EPA guidance level of 4 pCi/L.  |

**Table 9 (continued)**  
**Notifications and Restrictions Summary**  
**for Transfer Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40, and 41**

| Parcel No. | Environmental Factor | Notification/Restriction   |
|------------|----------------------|--|
| 34         | ACM                  | <p>Copies of the ACM survey reports for buildings/structures in this parcel will be included in the transfer documentation. Buildings restricted based on ACM FAD hazards may be occupied on an interim basis if the transferee conducts the necessary ACM surveys and abatement according to all local, state, and federal requirements.</p> <p>The Irvine Park North residential buildings and Structures 6480, 6877, 6878, 6879, and 6880 (scheduled for demolition or "to be determined") are restricted from occupancy. The deed will indicate that the transferee assumes responsibility for the management of ACM, including the removal and/or management of ACM prior to or during demolition, in accordance with applicable laws.</p>                      |
| 34         | LBP                  | <p>Copies of the LBP survey reports for buildings/structures in this parcel will be included in the transfer documentation. Buildings restricted based on LBP hazards may be occupied on an interim basis if the transferee conducts the necessary LBP surveys and abatement according to all local, state, and federal requirements.</p> <p>Structures 6480, 6877, and 6878 (dispositions "to be determined", and construction dates unknown) may be transferred without restrictions for occupancy due to LBP because these structures do not have painted surfaces (or limited amounts).</p> <p>The Irvine Park North residential buildings and Structures 6879 and 6880 (built after 1978) may be transferred without restrictions for occupancy due to LBP.</p> |
| 34         | Unexploded Ordnance  | A former pistol/rifle range and skeet range were located on this parcel. According to the IRP-2 Remedial Investigation, no further action is necessary for this site.  |
| 35         | PCBs                 | Fluorescent light fixtures that may contain small amounts of PCBs may be in buildings on this parcel. If the transferee plans to dispose of fluorescent light ballast containing more than 3 pounds of PCB fluid, the PCB small capacitors in those light ballasts should be processed as regulated items.   |
| 35         | Radon                | Radon testing was conducted in 1991 at a representative number of residential buildings. No radon readings were measured above the U.S. EPA guidance level of 4 pCi/L.   |

**Table 9 (continued)**  
**Notifications and Restrictions Summary**  
**for Transfer Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40, and 41**

| Parcel No. | Environmental Factor | Notification/Restriction   |
|------------|----------------------|--|
| 35         | ACM                  | <p>Copies of the ACM survey reports for buildings/structures in this parcel will be included in the transfer documentation. Buildings restricted based on ACM FAD hazards may be occupied on an interim basis if the transferee conducts the necessary ACM surveys and abatement according to all local, state, and federal requirements.</p> <p>The Moffett Meadows and Irvine Park South residential buildings, Building 6873, and Structures 215, 6874, 6875, and 6876 (scheduled for demolition or "to be determined") are restricted from occupancy. The deed will indicate that the transferee assumes responsibility for the management of ACM, including the removal and/or management of ACM prior to or during demolition, in accordance with applicable laws.</p>   |
| 35         | LBP                  | <p>Copies of the LBP survey reports for buildings/structures in this parcel will be included in the transfer documentation. Buildings restricted based on LBP hazards may be occupied on an interim basis if the transferee conducts the necessary LBP surveys and abatement according to all local, state, and federal requirements.</p> <p>The Moffett Meadows residential buildings (scheduled for demolition and built prior to 1978) are restricted from residential use and children will not be allowed to occupy these units. The transferee will be required to demolish the residential buildings in accordance with applicable laws and conduct post-demolition sampling and abatement of soil-lead hazards prior to occupation.</p> <p>Structure 215 (disposition "to be determined", and built prior to 1978) may be transferred without restrictions for occupancy due to LBP because this structure does not have painted surfaces (or limited amounts).</p> <p>Buildings 6873 and Structures 6874, 6875, and 6876 (built after 1978) may be transferred without restrictions for occupancy due to LBP.</p> <p>The Irvine Park South residential buildings (built after 1978) may be transferred without restrictions for occupancy due to LBP.</p> |
| 35         | Unexploded Ordnance  | A former pistol/rifle range was located on this parcel. According to the IRP-2 Remedial Investigation, no further action is necessary for this site.   |
| 36         | Radon                | Radon testing was conducted in 1991 at a representative number of residential buildings. No radon readings were measured above the U.S. EPA guidance level of 4 pCi/L.   |

**Table 9 (continued)**  
**Notifications and Restrictions Summary**  
**for Transfer Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40, and 41**

| Parcel No. | Environmental Factor | Notification/Restriction  |
|------------|----------------------|---|
| 36         | ACM                  | <p>Copies of the ACM survey reports for buildings/structures in this parcel will be included in the transfer documentation. Buildings restricted based on ACM FAD hazards may be occupied on an interim basis if the transferee conducts the necessary ACM surveys and abatement according to all local, state, and federal requirements.</p> <p>The Irvine Park South residential buildings (scheduled for demolition) are restricted from occupancy. The deed will indicate that the transferee assumes responsibility for the management of ACM, including the removal and/or management of ACM prior to or during demolition, in accordance with applicable laws.</p> |
| 36         | LBP                  | <p>Copies of the LBP survey reports for buildings/structures in this parcel will be included in the transfer documentation. Buildings restricted based on LBP hazards may be occupied on an interim basis if the transferee conducts the necessary LBP surveys and abatement according to all local, state, and federal requirements.</p> <p>The Irvine Park South residential buildings (built after 1978) may be transferred without restrictions for occupancy due to LBP.</p>   |
| 40         | Pesticides           | The 1992 PEA sampling and risk assessment and the 1996 pesticide investigation indicated that the property was suitable for unrestricted, residential use. At the time of transfer, DON will provide the transferee with documentation regarding past pesticide use on the property as well as a copy of the PEA Report and the Pesticide Investigation Report.   |
| 40         | Prime Farmland       | Prime farmland is located on this parcel. According to the final MCAS Tustin EIS/EIR, no mitigation measures are required.  |
| 40         | PCBs                 | Fluorescent light fixtures that may contain small amounts of PCBs may be in buildings on this parcel. If the transferee plans to dispose of fluorescent light ballast containing more than 3 pounds of PCB fluid, the PCB small capacitors in those light ballasts should be processed as regulated items.  |
| 40         | Wetlands             | Portions of this parcel consist of drainage facilities designated as jurisdictional wetlands, including vegetated or seasonal wetlands. Development by the transferee in wetland areas will require Section 404 (Clean Water Act) permits.  |

**Table 9 (continued)**  
**Notifications and Restrictions Summary**  
**for Transfer Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40, and 41**

| Parcel No. | Environmental Factor | Notification/Restriction  |
|------------|----------------------|---|
| 40         | ACM                  | <p>Copies of the ACM survey reports for buildings/structures in this parcel will be included in the transfer documentation. Buildings restricted based on ACM FAD hazards may be occupied on an interim basis if the transferee conducts the necessary ACM surveys and abatement according to all local, state, and federal requirements.</p> <p>Buildings 162, 516 and 3002T and Structure 6480 (scheduled for demolition or "to be determined") are restricted from occupancy. The deed will indicate that the transferee assumes responsibility for the management of ACM, including the removal and/or management of ACM prior to or during demolition, in accordance with applicable laws.</p> <p>Building 182 (scheduled for demolition) will not be restricted from occupancy; however if any ACM is detected in the building, the transferee must assume responsibility for the management of such ACM, including the removal and/or management of ACM prior to or during demolition.</p>   |
| 40         | LBP                  | <p>Copies of the LBP survey reports for buildings/structures in this parcel will be included in the transfer documentation. Buildings restricted based on LBP hazards may be occupied on an interim basis if the transferee conducts the necessary LBP surveys and abatement according to all local, state, and federal requirements.</p> <p>Buildings 162, 182, and 3002T (scheduled for demolition and built prior to 1978 or with unknown construction date) are restricted from residential use and children will not be allowed to occupy this building. The transferee will be required to demolish the building in accordance with applicable laws and conduct post-demolition sampling and abatement of soil-lead hazards prior to occupation.</p> <p>Structure 6480 (disposition "to be determined" with an unknown construction date) may be transferred without restrictions for occupancy due to LBP because this structure does not have painted surfaces (or limited amounts).</p> <p>Building 516 (built after 1978) may be transferred without restrictions for occupancy due to LBP.</p> |
| 40         | Unexploded Ordnance  | The safety arc of a former pistol/rifle range was located on this parcel. According to the IRP-2 Remedial Investigation, no further action is necessary for this site.  |
| 40         | Well Access          | Access to monitoring well BMW06S will be required after property transfer. This monitoring well and its associated equipment shall not be altered, disturbed, or removed without the prior review and written approval of DON and the BCT.  |
| 41         | Wetlands             | Portions of this parcel consist of drainage facilities designated as jurisdictional wetlands, including vegetated or seasonal wetlands. Development by the transferee in wetland areas will require Section 404 (Clean Water Act) permits.  |

**Table 9 (continued)**  
**Notifications and Restrictions Summary**  
**for Transfer Parcels 23, 29, 34, 35, and 36, and**  
**Portions of 1, 16, 17, 24, 27, 28, 40, and 41**

| Parcel No. | Environmental Factor | Notification/Restriction   |
|------------|----------------------|--|
| 41         | ACM                  | Copies of the ACM survey reports for buildings/structures in this parcel will be included in the transfer documentation. Buildings restricted based on ACM FAD hazards may be occupied on an interim basis if the transferee conducts the necessary ACM surveys and abatement according to all local, state, and federal requirements. |
| 41         | LBP                  | Copies of the LBP survey reports for buildings/structures in this parcel will be included in the transfer documentation. Buildings restricted based on LBP hazards may be occupied on an interim basis if the transferee conducts the necessary LBP surveys and abatement according to all local, state, and federal requirements.     |
| 41         | Well Access          | Access to surface water gauging location 1SW06 will be required after property transfer. This surface water gauging location and its associated equipment shall not be altered, disturbed, or removed without the prior review and written approval of DON and the BCT.  |
| 41         | Unexploded Ordnance  | The safety arc of a former pistol/rifle range was located on this parcel. According to the IRP-2 Remedial Investigation, no further action is necessary for this site.   |

**Acronyms/ Abbreviations:**

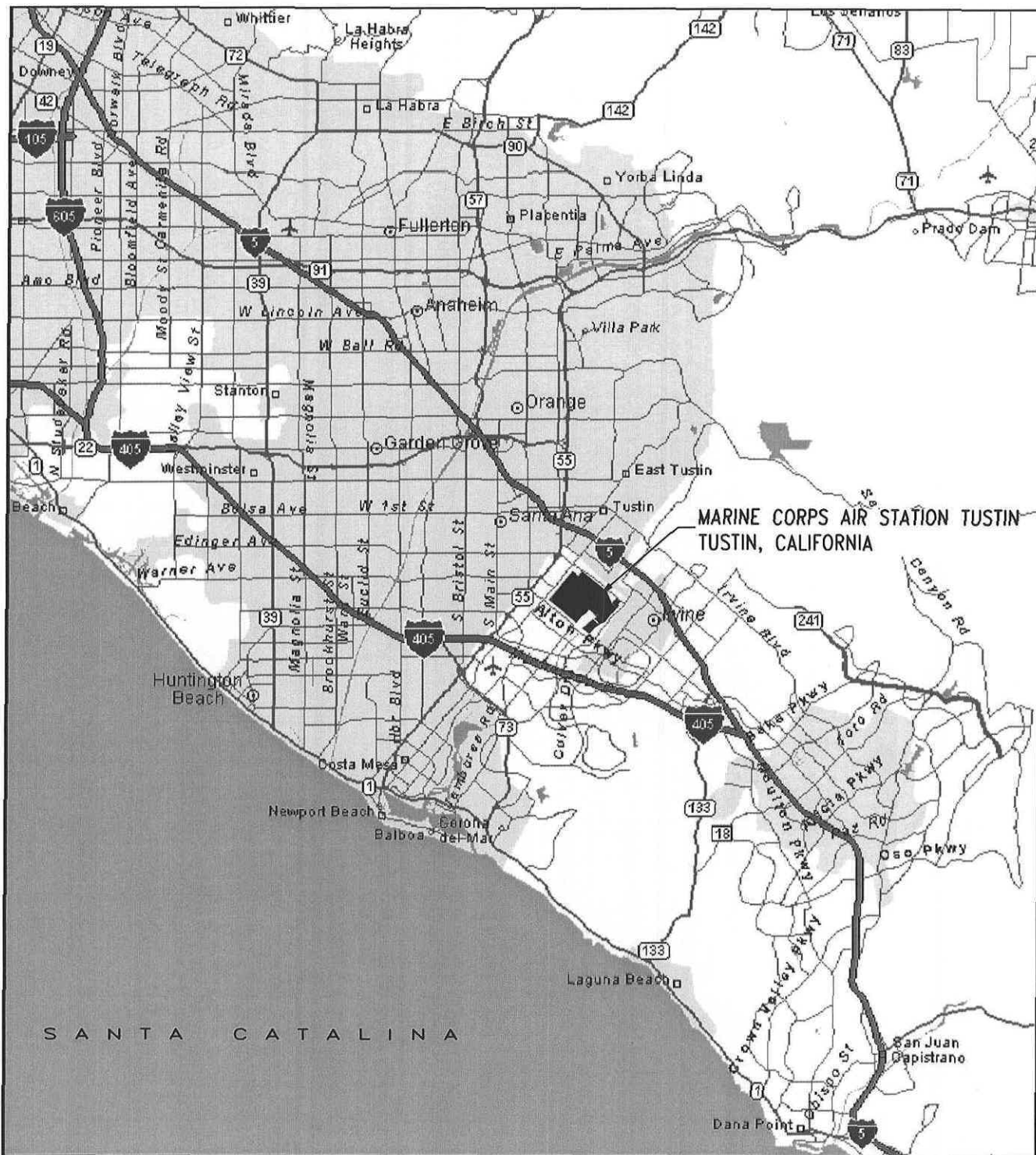
ACM - asbestos-containing material  
CEC - California education Code  
CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act  
DON - United States Department of the Navy  
EIS/EIR - environmental impact statement/environmental impact report  
FAD - friable, accessible, and damaged  
LBP - lead-based paint  
MCAS - Marine Corps Air Station  
PCBs - polychlorinated biphenyls  
PEA - preliminary endangerment assessment  
pCi/L - picocuries per liter  
ppm - parts per million  
U.S. EPA - United States Environmental Protection Agency

M62535.001945  
MCAS TUSTIN  
SSIC # 5090.3

## FIGURES

FINDING OF SUITABILITY TO TRANSFER  
FOR PARCELS 23, 29, 34, 35, AND 36, AND  
PORTIONS OF 1, 16, 17, 24, 27, 28, 40 AND 41

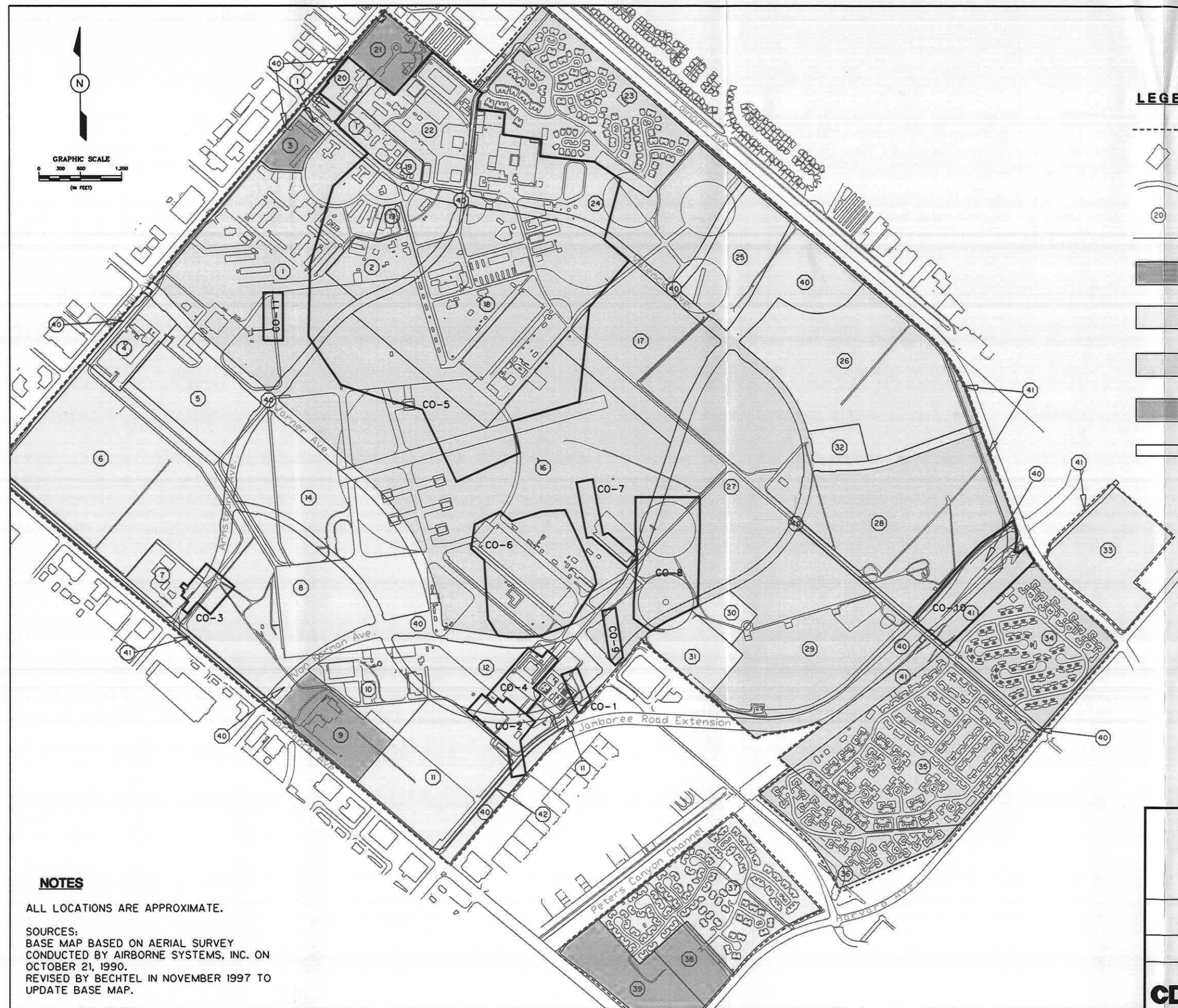
DATED 22 APRIL 2002



|   |             |             |
|---|-------------|-------------|
| MCAS TUSTIN<br>TUSTIN, CALIFORNIA       |             | FOST 3      |
| <b>CDM</b> Federal Programs Corporation |             | DATE: 04/02 |
|   |             | FN: 010_01T |
| MODIFIED BY: <i>J. Brown</i>            | PROJECT NO. | 1801-010    |

**MARINE CORPS AIR STATION  
TUSTIN VICINITY MAP**

**FIGURE  
1**



# LEGEND

- GOVERNMENT PROPERTY LINE
- ▭ BUILDING OR STRUCTURE
- EXISTING ROAD OR PAVED AREA
- ②① PARCEL NUMBER
- PARCEL BOUNDARIES
- FOST FOR PARCELS 3, 21, 38, 39, AND PORTIONS OF 40
- FOST FOR SOUTHERN PARCELS 4-8, 10-12, 14, AND 42, AND PARCELS 25, 26, 30-33, 37, AND PORTIONS OF 40 AND 41
- FOST FOR PARCELS 23, 29, 34, 35, AND 36, AND PORTIONS OF 1, 16, 17, 24, 27, 28, 40 AND 41
- FED TO FED
- CARVE-OUT AREAS

## ACRONYMS

CO - Carve-Out area  
FOST - Finding of Suitability to Transfer

## NOTES

ALL LOCATIONS ARE APPROXIMATE.

SOURCES:  
BASE MAP BASED ON AERIAL SURVEY  
CONDUCTED BY AIRBORNE SYSTEMS, INC. ON  
OCTOBER 21, 1990.  
REVISED BY BECHTEL IN NOVEMBER 1997 TO  
UPDATE BASE MAP.

**Figure 2**  
**TRANSFER PROPERTY LOCATION MAP**

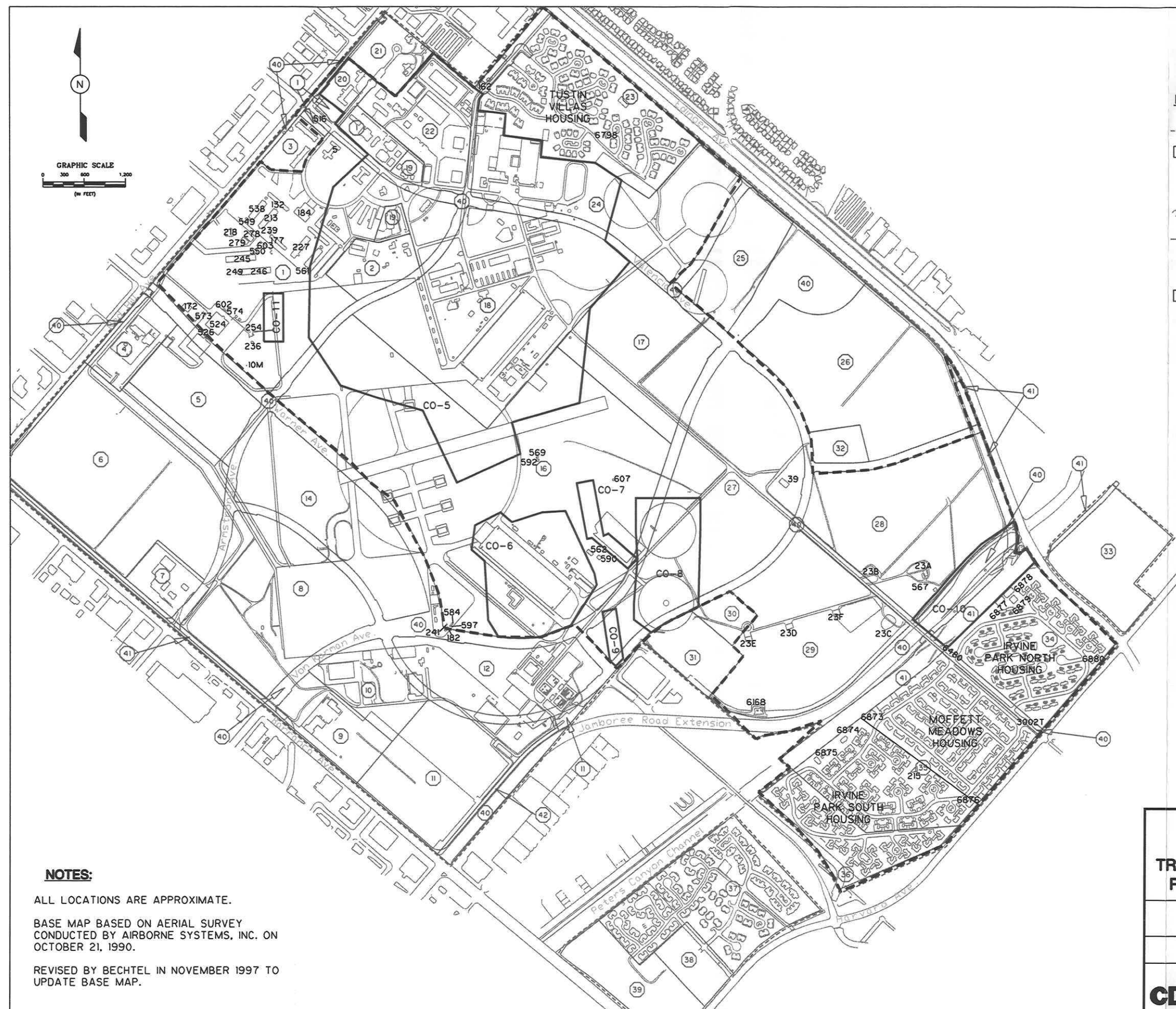
Marine Corps Air Station Tustin FOST 3  
Tustin, California

Date: 04/02

File No.: 010\_02T

DO No.: 1801-010

**CDM** Federal Programs Corporation



# LEGEND

- GOVERNMENT PROPERTY LINE
- [---] FOST 3 BOUNDARIES
- 1 BUILDING OR STRUCTURE
- EXISTING ROAD OR PAVED AREA
- PARCEL BOUNDARIES
- 20 PARCEL NUMBER
- CARVE-OUT AREAS

## ACRONYMS

CO - Carve-Out area  
FOST - Finding of Suitability to Transfer

## NOTES:

ALL LOCATIONS ARE APPROXIMATE.

BASE MAP BASED ON AERIAL SURVEY  
CONDUCTED BY AIRBORNE SYSTEMS, INC. ON  
OCTOBER 21, 1990.

REVISED BY BECHTEL IN NOVEMBER 1997 TO  
UPDATE BASE MAP.

**Figure 3**  
**BUILDINGS AND STRUCTURES WITHIN**  
**TRANSFER PARCELS 23, 29, 34, 35, AND 36, AND**  
**PORTIONS OF 1, 16, 17, 24, 27, 28, 40, AND 41**

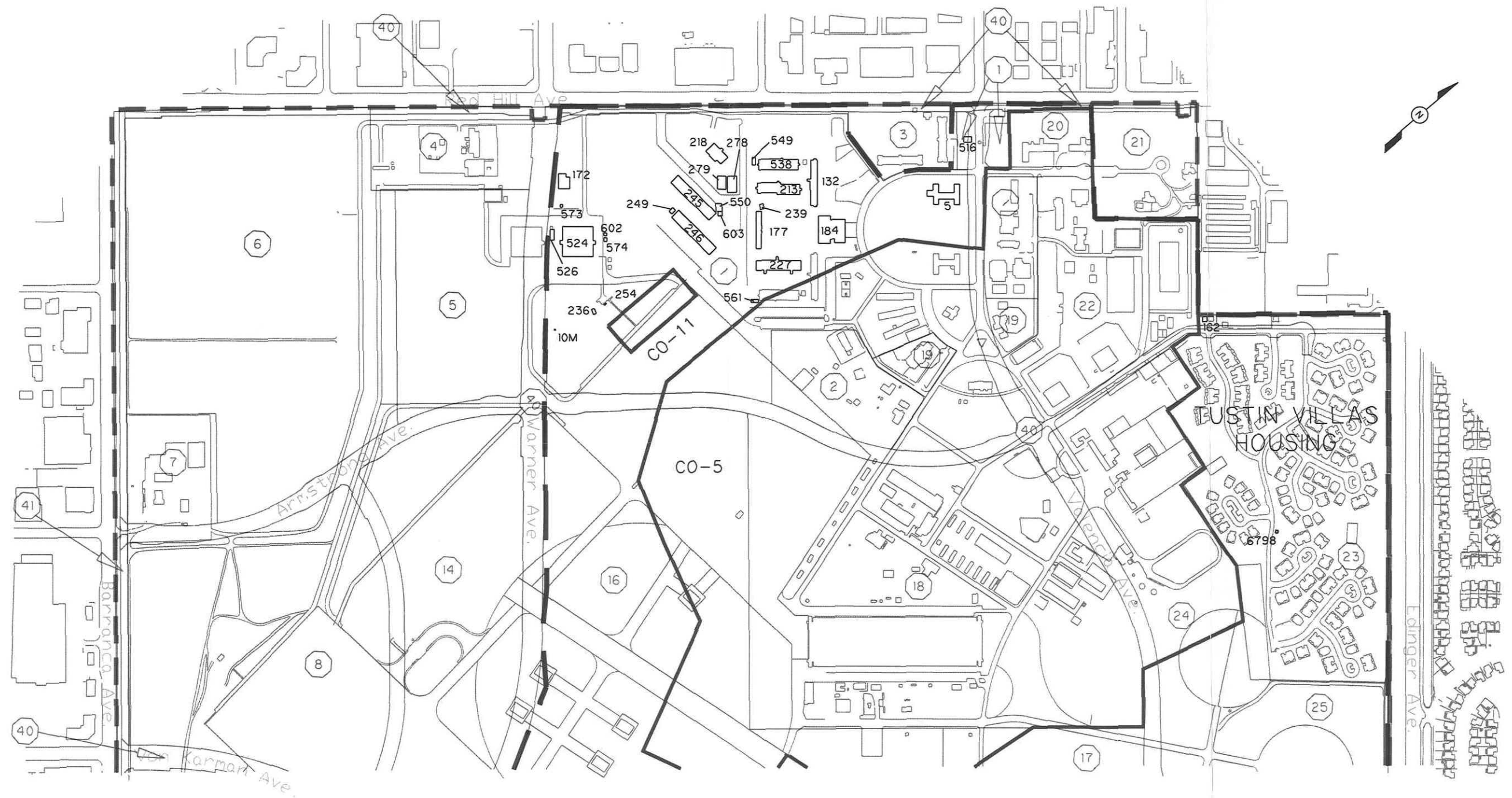
Marine Corps Air Station Tustin FOST 3  
Tustin, California

Date: 04/02

File No.: 010\_03T

DO No.: 1801-010

**CDM** Federal Programs Corporation



# **LEGEND**

- GOVERNMENT PROPERTY LINE
- FOST 3 BOUNDARIES
- 1 BUILDING OR STRUCTURE
- EXISTING ROAD OR PAVED AREA
- PARCEL BOUNDARIES
- 20 PARCEL NUMBER
- CARVE-OUT AREAS

## **NOTES:**

ALL LOCATIONS ARE APPROXIMATE.

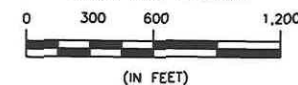
BASE MAP BASED ON AERIAL SURVEY  
CONDUCTED BY AIRBORNE SYSTEMS, INC. ON  
OCTOBER 21, 1990.

REVISED BY BECHTEL IN NOVEMBER 1997 TO  
UPDATE BASE MAP.

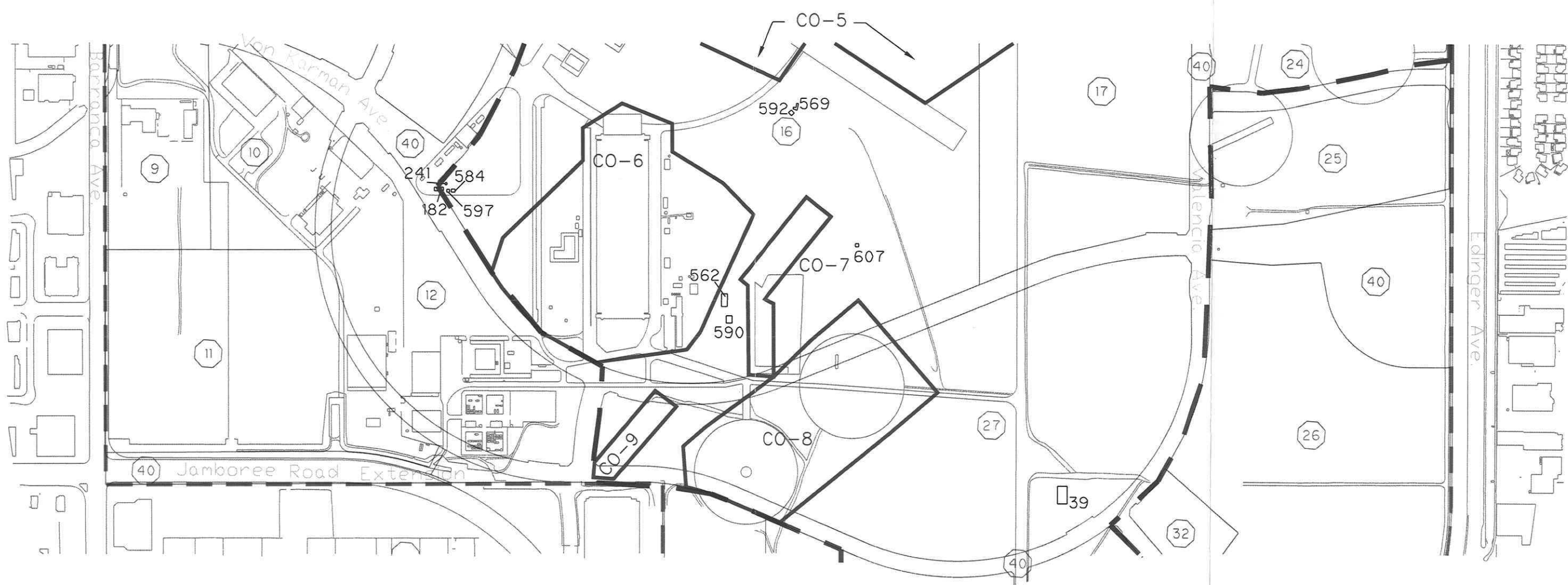
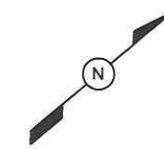
## **ACRONYMS**

CO - Carve-Out area  
FOST - Finding of Suitability to Transfer

## **GRAPHIC SCALE**



|   |                   |
|---|-------------------|
| <p><b>Figure 4</b><br/><b>BUILDINGS AND STRUCTURES WITHIN</b><br/><b>TRANSFER PARCEL 23, AND PORTIONS OF 1, 16,</b><br/><b>24, AND 40</b></p> |                   |
| <p>Marine Corps Air Station Tustin FOST 3<br/>Tustin, California</p>  |                   |
|   | Date: 04/02       |
|   | File No.: 010_04T |
| CDM Federal Programs Corporation  | DO No.: 1801-010  |



**LEGEND**

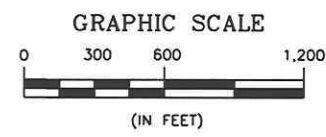
- GOVERNMENT PROPERTY LINE
- FOST 3 BOUNDARIES
- 1 BUILDING OR STRUCTURE
- EXISTING ROAD OR PAVED AREA
- PARCEL BOUNDARIES
- 20 PARCEL NUMBER
- CARVE-OUT AREAS

**NOTES:**

ALL LOCATIONS ARE APPROXIMATE.  
BASE MAP BASED ON AERIAL SURVEY  
CONDUCTED BY AIRBORNE SYSTEMS, INC. ON  
OCTOBER 21, 1990.  
REVISED BY BECHTEL IN NOVEMBER 1997 TO  
UPDATE BASE MAP.

**ACRONYMS**

CO - Carve-Out area  
FOST - Finding of Suitability to Transfer



**Figure 5**  
**BUILDINGS AND STRUCTURES WITHIN PORTIONS**  
**OF TRANSFER PARCELS 16, 17, 24, 27, AND 40**

|  |          |
|--|----------|
| Marine Corps Air Station Tustin FOST 3<br>Tustin, California |          |
| Date:  | 04/02    |
| File No.:  | 010_05T  |
| DO No.:  | 1801-010 |

**CDM** Federal Programs Corporation



# **LEGEND**

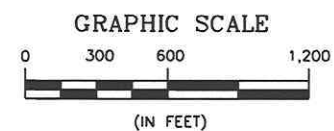
- — GOVERNMENT PROPERTY LINE
- — FOST 3 BOUNDARIES
- 1 BUILDING OR STRUCTURE
- EXISTING ROAD OR PAVED AREA
- — PARCEL BOUNDARIES
- 20 PARCEL NUMBER
- CARVE-OUT AREAS

## **NOTES:**

ALL LOCATIONS ARE APPROXIMATE.  
 BASE MAP BASED ON AERIAL SURVEY  
 CONDUCTED BY AIRBORNE SYSTEMS, INC. ON  
 OCTOBER 21, 1990.  
 REVISED BY BECHTEL IN NOVEMBER 1997 TO  
 UPDATE BASE MAP.

## **ACRONYMS**

CO - Carve-Out area  
 FOST - Finding of Suitability to Transfer



**Figure 6**  
**BUILDINGS AND STRUCTURES WITHIN**  
**TRANSFER PARCELS 29, 34, 35, AND 36, AND**  
**PORTIONS OF 28, 40, AND 41**

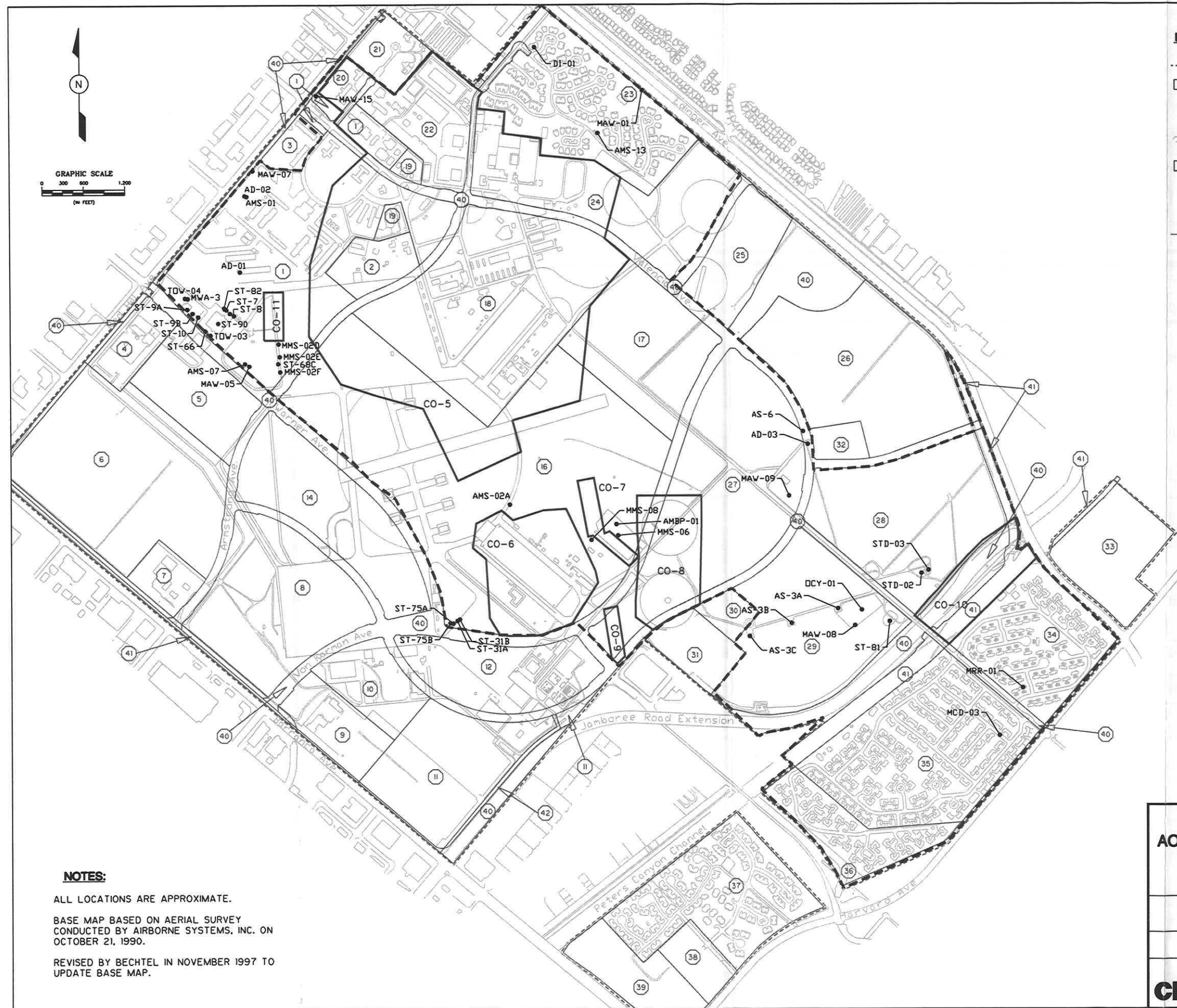
Marine Corps Air Station Tustin FOST 3  
 Tustin, California

Date: 04/02

File No.: 010\_06T

DO No.: 1801-010

**CDM** Federal Programs Corporation



# LEGEND

- GOVERNMENT PROPERTY LINE
- FOST 3 BOUNDARIES
- ◇ BUILDING OR STRUCTURE
- EXISTING ROAD OR PAVED AREA
- ▭ CARVE-OUT AREAS
- AOCs (NFA)
- ②① PARCEL NUMBER
- PARCEL BOUNDARIES

## ACRONYMS

- AD - aerial photograph, possible disposal
- AMBP - aerial photograph, miscellaneous, possible burn pit
- AMS - aerial photograph, miscellaneous, stain, possible spill
- AOC - area of concern
- AS - aerial photograph, storage, possible temporary storage
- CO - Carve-Out area
- DI - disposal, incinerator
- FOST - Finding of Suitability to Transfer
- MAW - miscellaneous, abandoned well
- MCD - miscellaneous, crash drill site
- MMS - miscellaneous, major spill
- MRR - miscellaneous, rifle range
- MWA - miscellaneous, wash area
- NFA - no further action
- OCY - Osumi Corporation Yard
- ST - storage, temporary
- STD - storage, designated hazardous waste storage area
- TOW - treatment, oil/water separator

## NOTES:

ALL LOCATIONS ARE APPROXIMATE.

BASE MAP BASED ON AERIAL SURVEY  
CONDUCTED BY AIRBORNE SYSTEMS, INC. ON  
OCTOBER 21, 1990.

REVISED BY BECHTEL IN NOVEMBER 1997 TO  
UPDATE BASE MAP.

**Figure 7**  
**AOCs WITHIN TRANSFER PARCELS 23, 29, 34, 35,**  
**AND 36, AND PORTIONS OF 1, 16, 17, 24,**  
**27, 28, 40, AND 41**

Marine Corps Air Station Tustin FOST 3  
Tustin, California

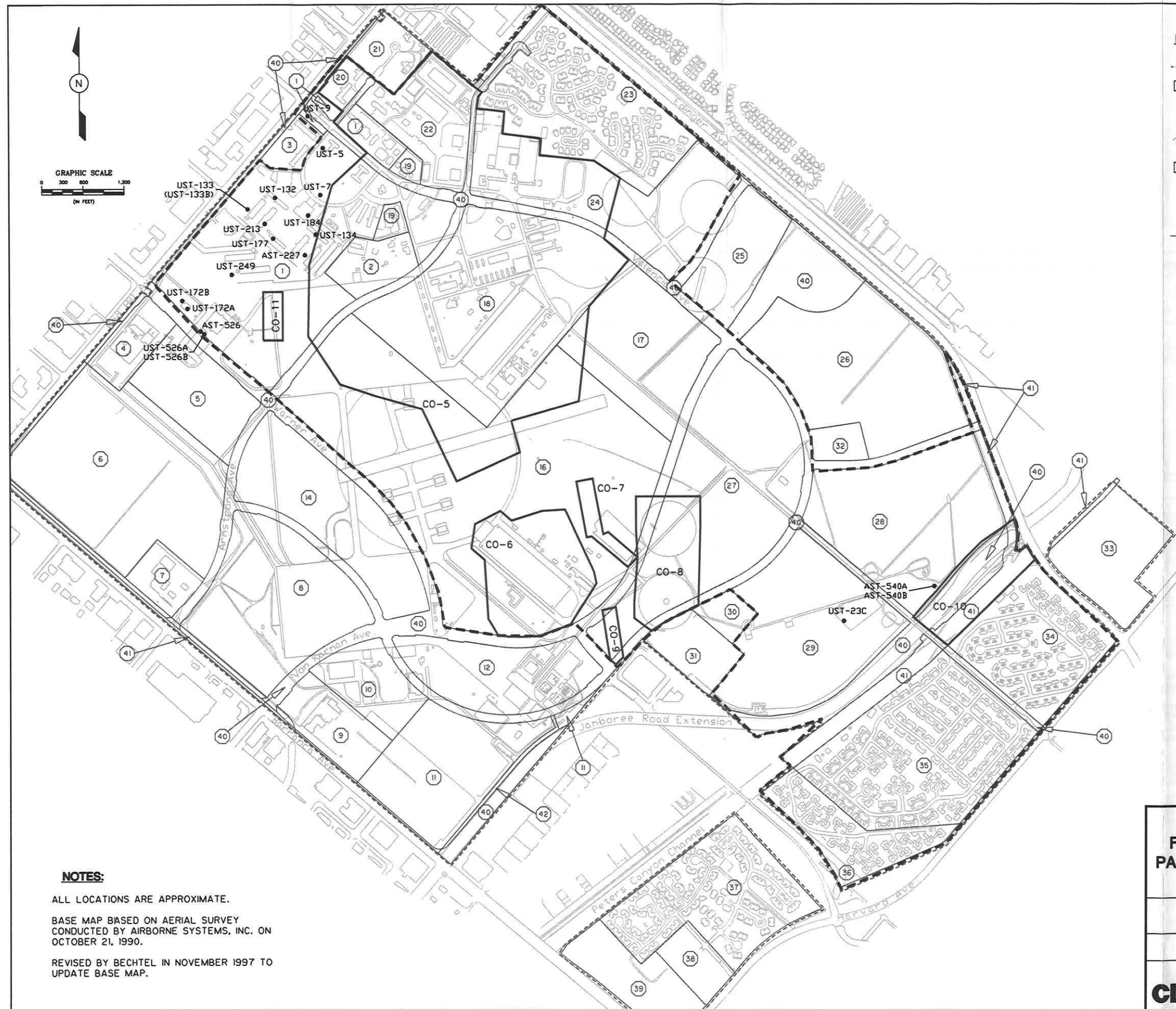
**CDM**

Federal Programs Corporation

Date: 04/02

File No.: 010\_07T

DO No.: 1801-010



# LEGEND

- GOVERNMENT PROPERTY LINE
- FOST 3 BOUNDARIES
- ◇ BUILDING OR STRUCTURE
- EXISTING ROAD OR PAVED AREA
- ▭ CARVE-OUT AREAS
- FORMER UST/AST SITES (NFA)
- ⓪ PARCEL NUMBER
- PARCEL BOUNDARIES

## ACRONYMS

AST - aboveground storage tank  
 CO - Carve-Out area  
 FOST - Finding of Suitability to Transfer  
 NFA - no further action  
 UST - underground storage tank

## NOTES:

ALL LOCATIONS ARE APPROXIMATE.

BASE MAP BASED ON AERIAL SURVEY CONDUCTED BY AIRBORNE SYSTEMS, INC. ON OCTOBER 21, 1990.

REVISED BY BECHTEL IN NOVEMBER 1997 TO UPDATE BASE MAP.

**Figure 8**  
**FORMER UST/AST SITES WITHIN TRANSFER**  
**PARCELS 23, 29, 34, 35, AND 36, AND PORTIONS**  
**OF 1, 16, 17, 24, 27, 28, 40, AND 41**

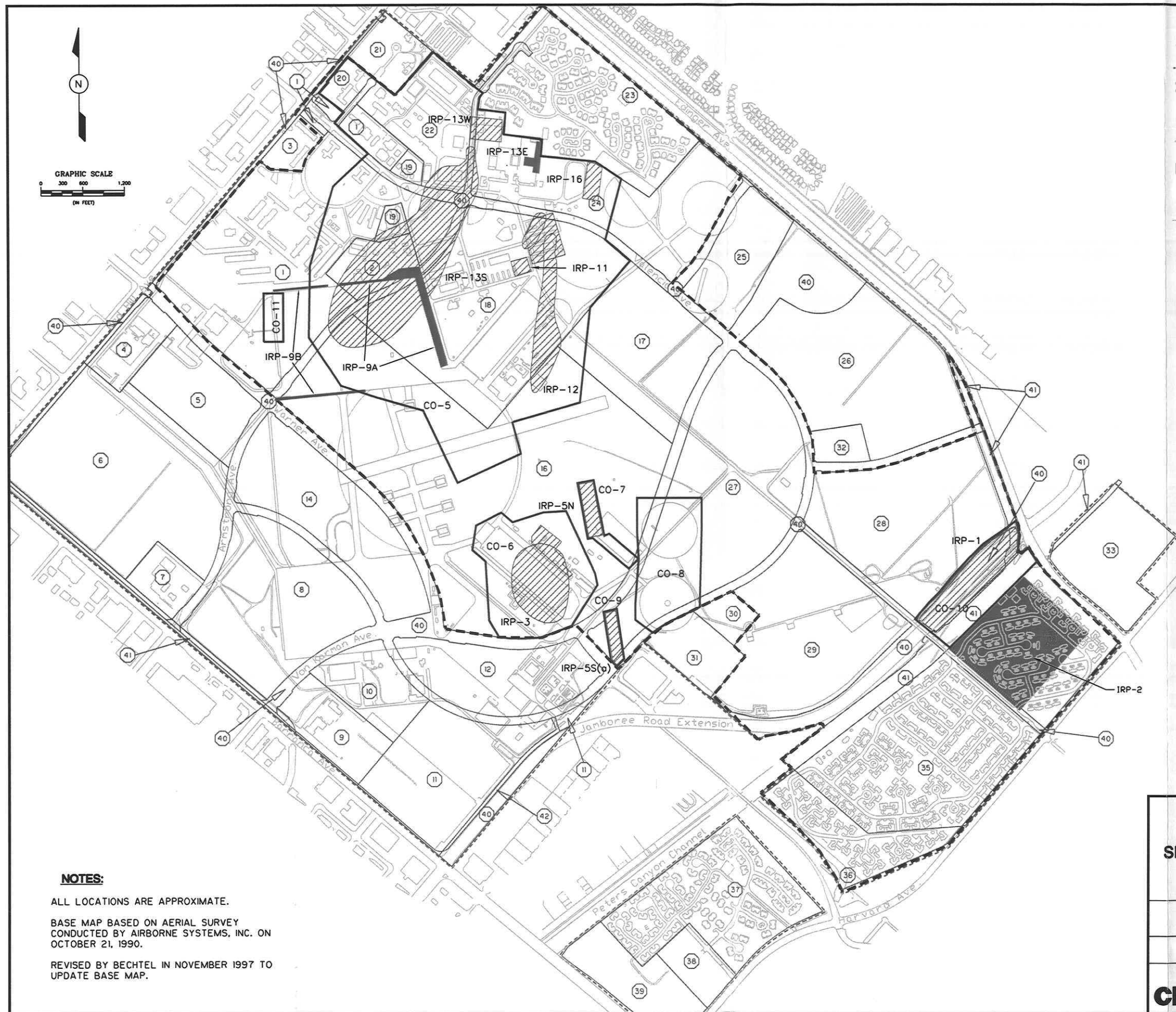
Marine Corps Air Station Tustin FOST 3  
 Tustin, California

**CDM** Federal Programs Corporation

Date: 04/02

File No.: 010\_08T

DO No.: 1801-010



**LEGEND**

- GOVERNMENT PROPERTY LINE
- - - - FOST 3 BOUNDARIES
- BUILDING OR STRUCTURE
- EXISTING ROAD OR PAVED AREA
- CARVE-OUT AREAS
- PARCEL NUMBER
- PARCEL BOUNDARIES
- ▨ IRP SITES (FURTHER ACTION IN PROGRESS)
- IRP SITES (NFA)

**ACRONYMS**

CO - Carve-Out area  
FOST - Finding of Suitability to Transfer  
IRP - Installation Restoration Program  
NFA - no further action

**NOTES:**

ALL LOCATIONS ARE APPROXIMATE.

BASE MAP BASED ON AERIAL SURVEY CONDUCTED BY AIRBORNE SYSTEMS, INC. ON OCTOBER 21, 1990.

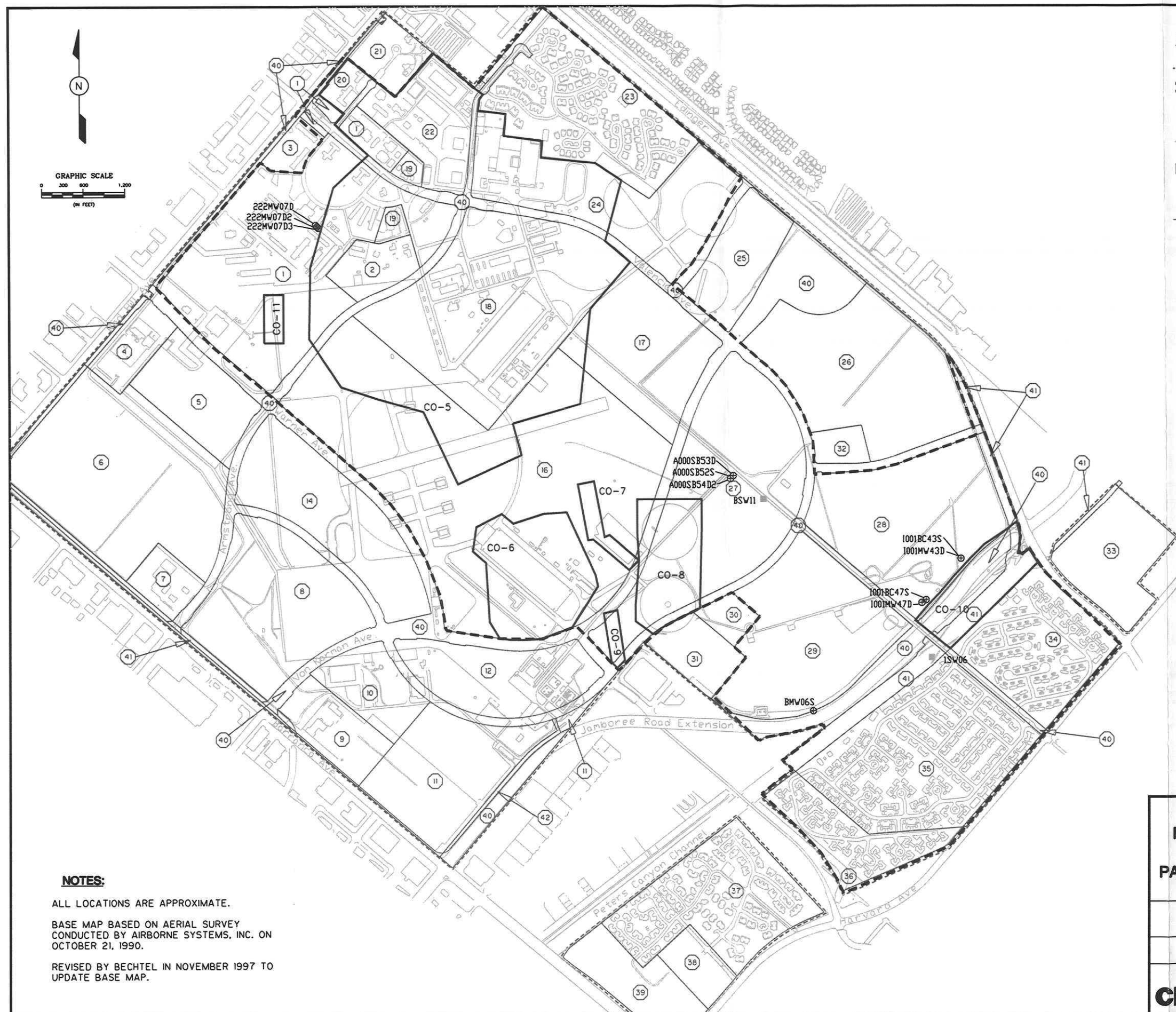
REVISED BY BECHTEL IN NOVEMBER 1997 TO UPDATE BASE MAP.

**Figure 9**  
**INSTALLATION RESTORATION PROGRAM**  
**SITES 1, 2, 3, 5N, 5S(a), 9A, 9B, 11, 12, 13E, 13S, 13W, AND 16**

Marine Corps Air Station Tustin FOST 3  
Tustin, California

|           |          |
|-----------|----------|
| Date:     | 04/02    |
| File No.: | 010_09T  |
| DO No.:   | 1801-010 |

**CDM** Federal Programs Corporation



- LEGEND**
- GOVERNMENT PROPERTY LINE
  - - - FOST 3 BOUNDARIES
  - BUILDING OR STRUCTURE
  - EXISTING ROAD OR PAVED AREA
  - ▭ CARVE-OUT AREAS
  - ⊙ PARCEL NUMBER
  - PARCEL BOUNDARIES
  - SURFACE WATER GAUGING LOCATION
  - ⊕ MONITORING WELL

**ACRONYMS**

CO - Carve-Out area  
FOST - Finding of Suitability to Transfer

**Figure 10**  
**MONITORING WELLS AND SURFACE WATER**  
**GAUGING LOCATIONS WITHIN TRANSFER**  
**PARCELS 23, 29, 34, 35, AND 36, AND PORTIONS**  
**OF 1, 16, 17, 24, 27, 28, 40, AND 41**  
Marine Corps Air Station Tustin FOST 3  
Tustin, California

**NOTES:**

ALL LOCATIONS ARE APPROXIMATE.

BASE MAP BASED ON AERIAL SURVEY  
CONDUCTED BY AIRBORNE SYSTEMS, INC. ON  
OCTOBER 21, 1990.

REVISED BY BECHTEL IN NOVEMBER 1997 TO  
UPDATE BASE MAP.

Date: 04/02

File No.: 010\_010T

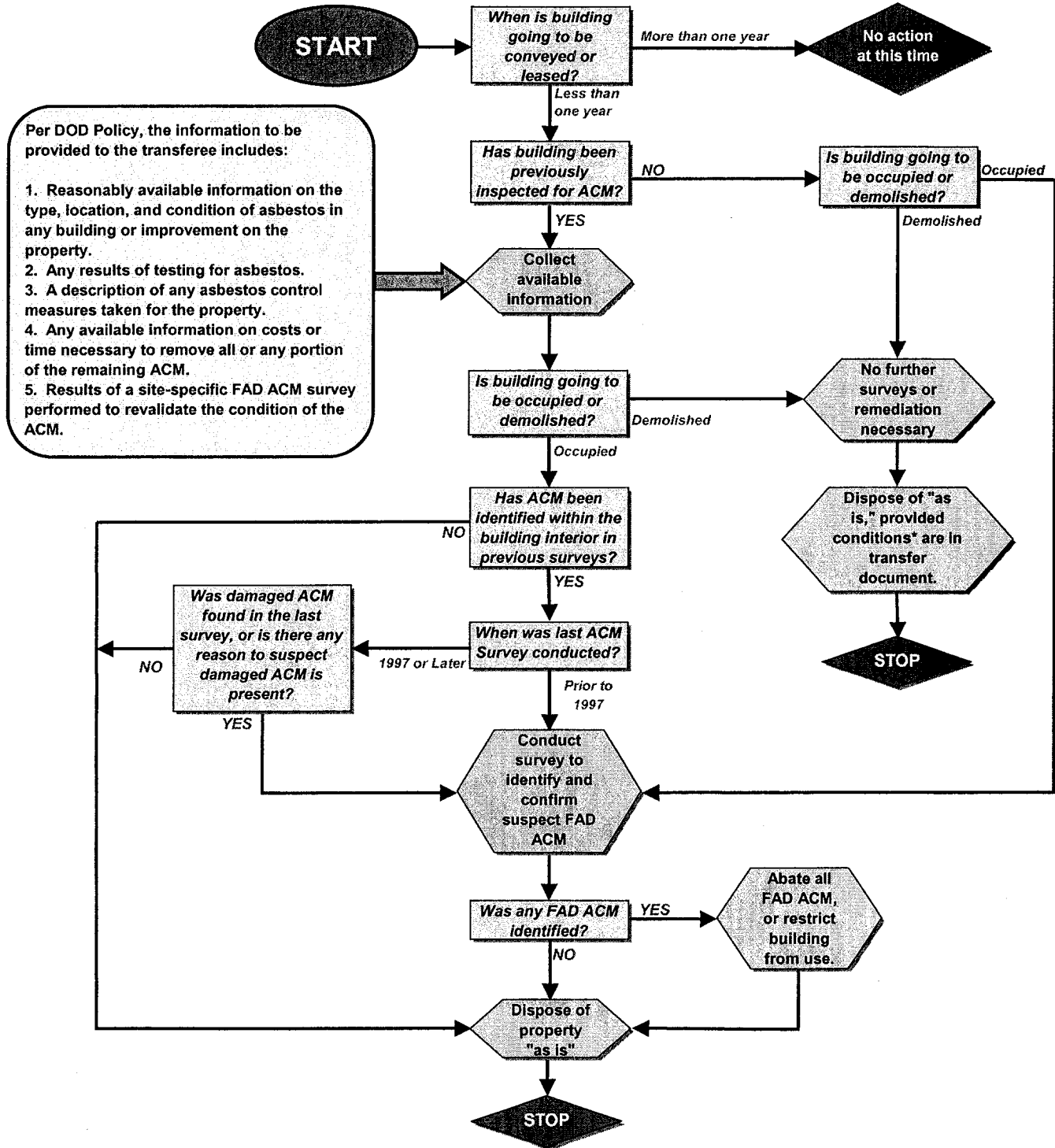
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**CDM** Federal Programs Corporation

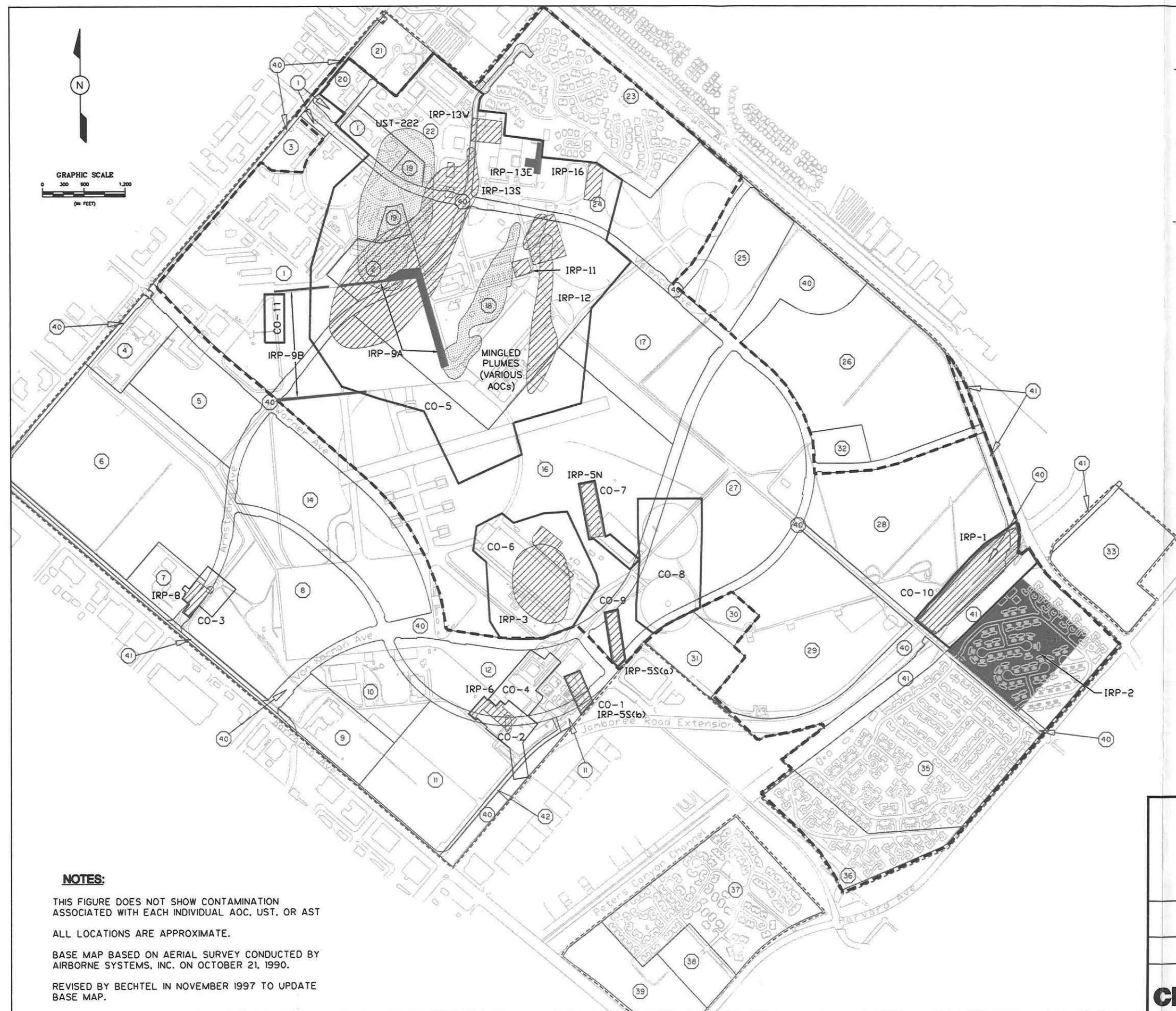
**FIGURE 11**  
**DECISION TREE FOR ASBESTOS-CONTAINING MATERIAL SURVEYS**

**DOD POLICY ON ASBESTOS AT BRAC PROPERTIES**

Prior to property disposal, all available information on the existence, extent and condition of ACM shall be provided to the transferee in an EBS report or other appropriate document. All property containing ACM will be conveyed, leased or otherwise disposed of as is through the BRAC process, unless it is determined by competent authority that the ACM in the property poses a threat to human health at the time of transfer. This flow chart summarizes the steps necessary to comply with the DOD policy on asbestos at BRAC properties.



\* Unless existing surveys indicate that there is no ACM which poses a threat to human health, the transfer document must prohibit occupation of the buildings prior to the demolition, and the transferee must assume responsibility for the management of any ACM in accordance with applicable laws.



# LEGEND

- GOVERNMENT PROPERTY LINE
- FOST 3 BOUNDARIES
- BUILDING OR STRUCTURE
- EXISTING ROAD OR PAVED AREA
- CARVE-OUT AREAS
- ⊙ PARCEL NUMBER
- PARCEL BOUNDARIES
- ▨ IRP SITES
- ▤ NON-IRP SITES
- NFA SITES

## ACRONYMS

AOC - area of concern  
CO - Carve-Out area  
FOST - Finding of Suitability to Transfer  
IRP - Installation Restoration Program  
NFA - no further action

## NOTES:

THIS FIGURE DOES NOT SHOW CONTAMINATION ASSOCIATED WITH EACH INDIVIDUAL AOC, UST, OR AST  
ALL LOCATIONS ARE APPROXIMATE.

BASE MAP BASED ON AERIAL SURVEY CONDUCTED BY AIRBORNE SYSTEMS, INC. ON OCTOBER 21, 1990.

REVISED BY BECHTEL IN NOVEMBER 1997 TO UPDATE BASE MAP.

**Figure 12**  
**CONTAMINATION BASE MAP**

Marine Corps Air Station Tustin FOST 3  
Tustin, California

Date: 04/02

File No.: 010\_12T

DO No.: 1801-010

**CDM** Federal Programs Corporation

**ATTACHMENT 1**  
**REFERENCES**

## REFERENCES

- Bechtel National, Inc. 1996a. Draft Final Expanded Site Inspection Report, Marine Corps Air Station Tustin, CA. Prepared for Southwest Division Naval Facilities Engineering Command. October.
- — —. 1996b. Draft Final Pesticides (and Associated Metals) Investigation Report, Marine Corps Air Station Tustin, CA. Prepared for Southwest Division Naval Facilities Engineering Command. July.
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HLA. See Harding Lawson Associates.

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— — —. 1995c. Lead and Asbestos Assessment, Marble Mountain Park 3 Housing, Tustin, CA. Prepared for Public Works Center, San Diego, CA. 10 December.

— — —. 1995d. Lead and Asbestos Assessment, Tustin Villas/Marble Mountain Park 1 Community, Tustin, CA. Prepared for Public Works Center, San Diego, CA. 14 December.

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**ATTACHMENT 2**  
**NO FURTHER ACTION REGULATORY CONCURRENCE LETTERS**  
**FOR AOCs, USTs, AND ASTs**  
**WITHIN TRANSFER PARCELS 23, 29, 34, 35, AND 36,**  
**AND PORTIONS OF 1, 16, 17, 24, 27, 28, 40, AND 41**

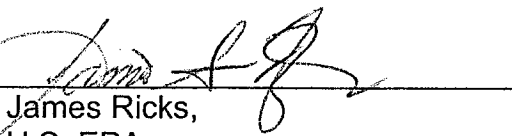
## CONCURRENCE SIGNATURE PAGE

### CONCURRENCE WITH NO FURTHER ACTION FOR AREA OF CONCERN OCY-01 AT MCAS TUSTIN, CALIFORNIA

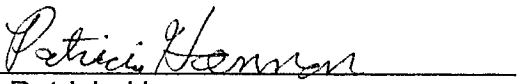
The following members of the BCT concur with the recommendation for no further action for area of concern (AOC) OCY-01 at MCAS Tustin, California.

  
Keith Forman,  
BRAC Environmental Coordinator

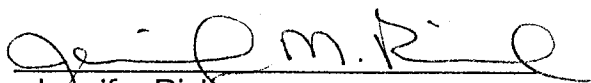
Date: 2/21/2002

  
James Ricks,  
U.S. EPA  
Project Manager

Date: 25 Feb '02

  
Patricia Hannon,  
RWQCB  
Project Manager

Date: 2-21-02

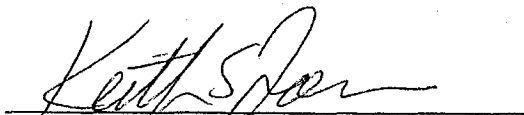
  
Jennifer Rich,  
Cal-EPA, DTSC  
Project Manager

Date: 2-21-02

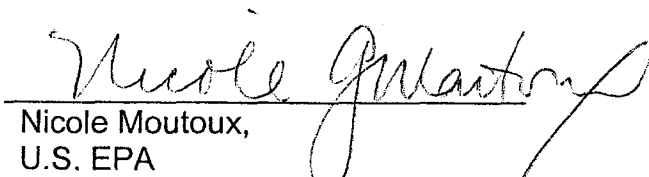
## CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREAS OF CONCERN MAW-09, MAW-10, MAW-11, MAW-12, MAW-13, MAW-14, AND MAW-15 AT MCAF TUSTIN, CALIFORNIA

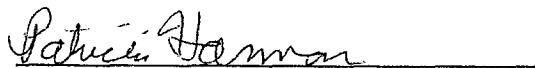
The following members of the BCT concur with the recommendation for no further action for areas of concern (AOC) MAW-09, MAW-10, MAW-11, MAW-12, MAW-13, MAW-14, and MAW-15 at MCAF Tustin, California.

  
Keith Forman,  
BRAC Environmental Coordinator

Date: 7/12/2001

  
Nicole Moutoux,  
U.S. EPA  
Project Manager

Date: 7/12/01

  
Patricia Hannon,  
RWQCB  
Project Manager

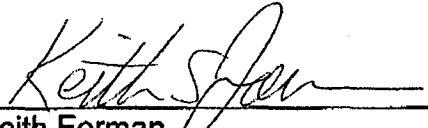
Date: 7/12/2001

  
Jennifer Rich,  
Cal-EPA, DTSC  
Project Manager


Date: 7/12/01

**CONCURRENCE SIGNATURE PAGE****CONCURRENCE TO REMOVE AREAS OF CONCERN (AOCs) MAW-01, MAW-02,  
MAW-03, MAW-04, MAW-05, AND MAW-06 FROM THE MCAS TUSTIN AOC  
LIST AT MCAS TUSTIN, CALIFORNIA**

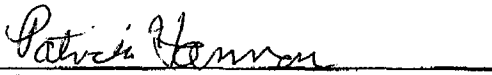
The following members of the BCT concur with the recommendation to remove areas of concern (AOCs) MAW-01, MAW-02, MAW-03, MAW-04, MAW-05, and MAW-06 from the MCAS Tustin AOC List at MCAS Tustin, California.

  
Keith Forman,  
BRAC Environmental Coordinator

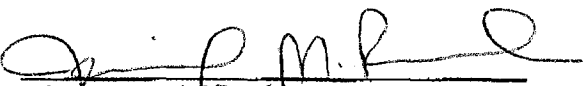
Date: 7/12/2001

  
Nicole Moutoux,  
U.S. EPA  
Project Manager

Date: 7/12/01

  
Patricia Hannon,  
RWQCB  
Project Manager

Date: 7/12/2001

  
Jennifer Rich,  
Cal-EPA, DTSC  
Project Manager

Date: 7/12/01



**DEPARTMENT OF THE NAVY**  
**SOUTHWEST DIVISION**  
**NAVAL FACILITIES ENGINEERING COMMAND**  
**1220 PACIFIC HIGHWAY**  
**SAN DIEGO, CA 92132-5190**

5090  
Ser 06CC.KF/0478  
May 1, 2001

Ms. Nicole Moutoux  
U.S. Environmental Protection Agency  
Superfund (SFD 8-1)  
Region IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

Ms. Jennifer Rich  
California Department of Toxic Substances Control  
Office of Military Facilities  
5796 Corporate Avenue  
Cypress, CA 90630

Ms. Patricia Hannon  
Santa Ana Regional Water Quality Control Board  
California Tower  
3737 Main Street, Suite 500  
Riverside, CA 92501-3339

Subj: **MCAS TUSTIN SUMMARY OF ACTIONS AND RECOMMENDATIONS  
FOR GROUNDWATER WELLS IDENTIFIED AS AREAS OF CONCERN  
(AOCs)**

Ref: (a) Final Report Locating Abandoned Agricultural Wells at Marine Corps Air  
Tustin, California, April 1995  
(b) Well Destruction Report for Closure of Well Sites 16/16D, 37, 38, 40, 49 and  
65, Marine Corps Air Facility Tustin, California, July 1998  
(c) Technical Memorandum, RAC Investigation for Site MAW-13 and MAW-14,  
Marine Corps Air Station Tustin, California, May 2001

Dear Fellow BRAC Cleanup Team (BCT) Members:

The purpose of this letter is to review the status of each of the 16 suspected abandoned wells that have been identified as AOCs in the MCAS Tustin compliance program and to make recommendations for their disposition. Enclosure (1) is provided to assist you in finding the location or presumed location of specific Miscellaneous, Abandoned Wells (MAWs).

The search for MAWs began with an analysis of aerial photographs and candidate AOCs were often listed based on either "irregularities" or difficult to distinguish surface features that lead to further investigation. In retrospect, some of the MAWs should not

5090  
Ser 06CC.KF/0478  
May 1, 2001

have been labeled as such; it was the intent of the project to be conservative and as inclusive as possible at the time of the initial investigations in 1994-5. A status summary and our recommendations for each MAW are provided as follows:

MAW-01 is located off-base. Aerial photographs and ground-penetrating radar were used to locate an anomaly which is near Edinger Avenue but not on government property (reference (a), Table 5-2). This was undertaken because the original search area included both on- and off-base property. An anomaly matching a well casing profile was found that is thought to be the original location of the well. After extensive road expansions, the current location of the well would be under Edinger Ave. Accordingly, this MAW is not an appropriate concern of the MCAS Tustin program. **Recommendation: Move MAW-01 to the list of AOCs "removed from consideration by BCT."**

MAW-02 and MAW-04 are located near Red Hill Avenue. Both wells are currently owned by Irvine Ranch Water District (IRWD) and are used for monitoring the regional aquifer. IRWD possesses a grant deed (recorded July 14, 1989) for the property. These wells should not be considered as AOCs in the MCAS Tustin program. **Recommendation: Move MAW-02 and MAW-04 to the list of AOCs "removed from consideration by BCT."**

MAW-03 and MAW-05 are active wells within the base fence line. Like the above MAWs, IRWD uses these wells to monitor the regional aquifer. IRWD owns these wells and has an easement for access to the wells (recorded December 1, 1989). These wells should not be considered as AOCs in the MCAS Tustin program. **Recommendation: Move MAW-03 and MAW-05 to the list of AOCs "removed from consideration by BCT."**

MAW-06 is better known informally as the "Osumi well" and has been used since approximately 1983 as a source of irrigation water for the crops planted by Osumi Farms, Inc. The well is owned by MCAS Tustin but was leased to Mr. Osumi to support his farming operations. Farming operations ceased in December 2000 and the well is not currently operational but is available for future use. This well is anticipated to transfer as a part of parcel 8 to the City of Tustin. It is not appropriate to retain MAW-06 as an "abandoned well" AOC in the MCAS Tustin program. **Recommendation: Move MAW-06 to the list of AOCs "removed from consideration by BCT."**

MAW-07 and MAW-08 have already gained "no further action" status as of the November 16, 2000 BCT meeting.

MAW-09 was an anomaly discovered during the geophysical investigation of Search Area 14 per reference (a) (refer specifically to Tables 5-1, 5-2 and 6-1 as well as Figure

5090  
Ser 06CC.KF/0478  
May 1, 2001

6-1). When the magnetic field data was processed, the featured anomaly was interpreted to be caused by a culvert now located in an agricultural section of the base. No well casing or any other physical evidence of a well was ever located.

**Recommendation: Concur with "no further action" for MAW-09.**

MAW-10 is an off-base possible well (identified in aerial photographs as an "unidentifiable feature") located underneath the intersection of Jamboree Road and Edinger Avenue. Reference (a) indicates the location is possibly a sewer manhole in the intersection but certainly not a well. **Recommendation: Concur with "no further action" for MAW-10.**

MAW-11 was not located at MCAS Tustin. Per reference (a), four possible search areas were established to find the well (refer to Table 6-1). Three of the four locations were determined to be manholes, and the fourth location (Search Area 28A) indicated no magnetic anomalies. **Recommendation: Concur with "no further action" for MAW-11.**

MAW-12 was also not located at MCAS Tustin. Per section 6.1 of reference (a), the area under investigation for the location of the well (Search Area 20) has "been thoroughly searched without significant cultural interference and is no longer considered an area in which wells are likely to be found." Ground-penetrating radar revealed no anomalies that match any part of the target profile (a well casing).

**Recommendation: Concur with "no further action" for MAW-12.**

MAW-13 and MAW-14 are the subject of reference (c). MAW-13 was recommended for further investigation per reference (a) when two anomalies possibly profiling steel well casings were identified. Both of the anomalies were excavated in March 1997 in conjunction with UST-20A. No well casings were found nor any other evidence of an abandoned well. MAW-14 was similarly recommended for further investigation per reference (a). A single anomaly was identified and, when excavated in conjunction with soil remediation activities at Installation Restoration Program (IRP) Site 9B (Subarea 1), The anomaly was found to be a buried storage locker that was subsequently removed. No well casing was found in the area of excavation. **Recommendation: Concur with "no further action" for MAW-13 and MAW-14.**

MAW-15 was identified as an anomaly worthy of further investigation per reference (a). This was also known as "suspected well sites Area 16/16D" during the geophysical investigation. Subsequent fieldwork documented in reference (b) revealed that the anomaly was not a well but rather a vault constructed of railroad ties. The railroad ties were removed and the excavation site was backfilled and compacted. Therefore, the anomaly no longer exists and there is no "well" to be identified as MAW-15. .

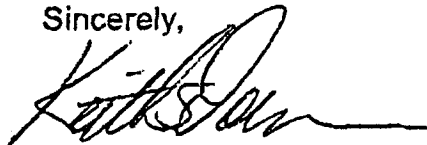
**Recommendation: Concur with "no further action" for MAW-15.**

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Ser 06CC.KF/0478  
May 1, 2001

MAW-16 has already gained "no further action" status as of the November 16, 2000 BCT meeting.

References (b) and (c) will be sent to you via separate correspondence. Please be ready to discuss the disposition of the MAWs at the next BCT meeting on May 24, 2001. If you have any questions, please contact Ms. DeAnna Dunbar at (619) 532-0794 or myself at (619) 532-0786.

Sincerely,



KEITH S. FORMAN  
Base Realignment and Closure  
Environmental Coordinator  
By direction of the Commander

Enclosure: 1. Basewide Environmental Baseline Survey, Figure 5-8, Areas of Concern Addressed Under California Abandoned Well Program, Marine Corps Air Station Tustin

Copy to:  
Mr. Dana Ogdon  
Senior Planner  
City of Tustin  
300 Centennial Way  
Tustin, CA 92780

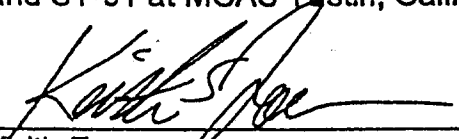
Mr. Richard Bell  
Irvine Ranch Water District  
15600 Sand Canyon Avenue  
Irvine, CA 92618-3102

Mr. Sam Abu-Shaban  
Orange County Health Care Agency  
2009 E. Edinger Avenue  
Santa Ana, CA 92705

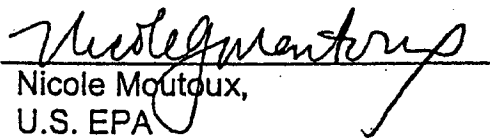
## CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREAS OF CONCERN  
ST-35, ST-36, ST-51, ST-72A, ST-88, ST-89, ST-90, AND ST-91 AT MCAS TUSTIN,  
CALIFORNIA

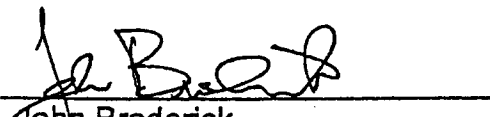
The following members of the BCT concur with the recommendation for no further action for areas of concern (AOC) ST-35, ST-36, ST-51, ST-72A, ST-88, ST-89, ST-90, and ST-91 at MCAS Tustin, California.

  
Keith Forman  
BRAC Environmental Coordinator

Date: 2/22/01

  
Nicole Moutoux,  
U.S. EPA  
Project Manager

Date: 2/22/01

  
John Broderick,  
RWQCB  
Project Manager

Date: 2/22/01

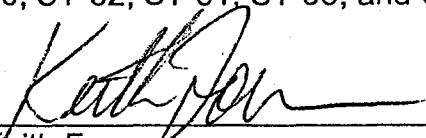
  
Jennifer Rich,  
Cal EPA, DTSC  
Project Manager

Date: 2/22/01

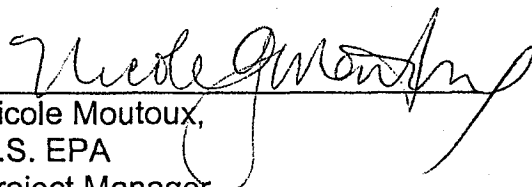
## CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREAS OF CONCERN  
ST-18B, ST-19, ST-20A, ST-20B, ST-48, ST-49, ST-50, ST-52, ST-81, ST-86, AND  
ST-87 AT MCAS TUSTIN, CALIFORNIA

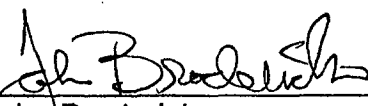
The following members of the BCT concur with the recommendation for no further action for areas of concern (AOC) ST-18B, ST-19, ST-20A, ST-20B, ST-48, ST-49, ST-50, ST-52, ST-81, ST-86, and ST-87 at MCAS Tustin, California.

  
Keith Forman,  
BRAC Environmental Coordinator

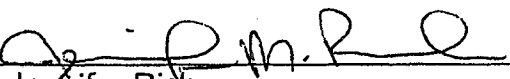
Date: 1/18/01

  
Nicole Moutoux,  
U.S. EPA  
Project Manager

Date: 1/18/01

  
John Broderick,  
RWQCB  
Project Manager

Date: 1/18/01

  
Jennifer Rich,  
Cal-EPA, DTSC  
Project Manager

Date: 1-18-01



# California Regional Water Quality Control Board

## Santa Ana Region



Gray Davis  
Governor

Arlin H. Hickox  
Secretary for  
Environmental  
Protection

Internet Address: <http://www.swrcb.ca.gov/rwqcb8>  
3737 Main Street, Suite 500, Riverside, California 92501-3348  
Phone (909) 782-4130 - FAX (909) 781-6288

January 17, 2001

Mr. Keith Forman, 06CC.KF  
BRAC Environmental Coordinator  
Naval Facilities Engineering Command, SWDIV  
1220 Pacific Highway  
San Diego, CA 92132-5190

**COMMENTS ON ABOVEGROUND STORAGE TANK REMOVAL REPORT,  
ABOVEGROUND STORAGE TANK SITES 28A, 28B, 183, 273A, 273B, 526, 558A,  
558B, AND 568, REVISION 1, FORMER MARINE CORPS AIR FACILITY, TUSTIN**

Dear Mr. Forman:

We have completed our review of the above referenced document dated December 7, 2000, and received at this office on December 8, 2000. We concur with the recommendation for no further action, with the provision that a correction page for Section 2.5 be submitted for Regional Board staff review and approval. The correction page must include the specific phrasing as written in response to our comment 5e.

For any questions on this review or related matters, please call me at (909) 782-4494.

Sincerely,

John Broderick  
SLIC/DoD/AGT Section


cc: Ms. Jennifer Rich, Department of Toxic Substances Control, OMF  
Ms. DeAnna Dunbar, Naval Facility Engineering Command, SWDIV  
Ms. Nicole Moutoux, U.S. EPA, Region IX

| DOCUMENT NAME  | APPROXIMATE DATE BCT RECEIVES (FFSRA DATES SHOWN IN BOLD ITALICS) | EXPECTED BCT REVIEW TIME(DAYS) AND DATE | COMMENTS   |
|--|---|---|--|
| <b>Items Completed/Deleted from last meeting:</b>                              |   |   |  |
| Non ST RCRA Sites Closure Report - Group 11 - MAE-07 (FINAL)                   | 29-Mar-01   | NA                                      | Signed at 3/29/01 BCT meeting                              |
| Work Plan Addendum for 2001 Groundwater Sampling                               | 13-Apr-01   | NA                                      | Provided for records.                                      |
| Historical Radiological Assessment (FINAL)                                     | 9-Apr-01  | NA                                      |  |
| AST Closure Report 28A, 28B, 183, 273A, 273B, 526, 558A, 558B, and 568 (FINAL) | 17-Jan-01   | NA                                      | At 3/29 BCT meeting, RWQCB concurred with NFA.             |
| Non ST RCRA Sites Closure Report - Group 10 - MWA-15, UST-89 (FINAL)           | 11-Apr-01   | NA                                      | TOW-X4 moved into CERCLA (OU-1B). NFA at 3/29 BCT meeting. |
| MWA-18 Tech Memo (FINAL)   | 5-Mar-01  | NA                                      |  |

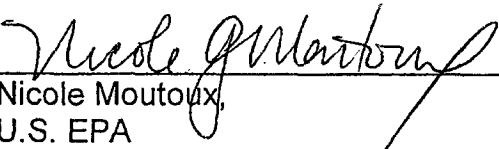
## CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREAS OF CONCERN  
MAW-07, MAW-08, MAW-16, TOW-03, UST-526A, UST-526B, AND TOW-07 AT  
MCAF TUSTIN, CALIFORNIA

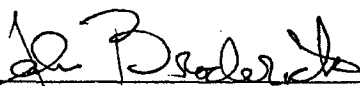
The following members of the BCT concur with the recommendation for no further action for areas of concern (AOC) MAW-07, MAW-08, MAW-16, TOW-03, UST-526A, UST-526B, and TOW-07 at MCAF Tustin, California.

  
Keith Forman,  
BRAC Environmental Coordinator

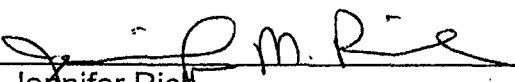
Date: 11/16/00

  
Nicole Moutoux,  
U.S. EPA  
Project Manager

Date: 11/16/00

  
John Broderick,  
RWQCB  
Project Manager

Date: 11/16/00

  
Jennifer Rich,  
Cal-EPA, DTSC  
Project Manager

Date: 11-16-00



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

September 28, 2000

Mr. Keith Forman, 06CC.KF  
BRAC Environmental Coordinator  
Marine Corps Air Facility Tustin  
Southwest Division  
Naval Facilities Engineering Command  
1220 Pacific Highway  
San Diego, CA 92132-5190

Re: Record of Decision, OU-2, No Action Sites and Areas of Concern, Marine Corps Air Facility, Tustin, September, 2000

Dear Mr. Forman:

The United States Environmental Protection Agency, Region IX (USEPA) has received and reviewed the Record of Decision for OU-2, No Action Sites and Areas of Concern for the Tustin Marine Corps Air Facility, September, 2000. The Record of Decision (ROD) addresses a number of sites and areas of concern where no remedial action is required to protect human health and the environment.

Since the Marine Corps Air Facility Tustin is not on the National Priorities List, USEPA does not have a formal concurrence role and will not be signing the ROD. However, the USEPA has been an active participant on the team overseeing the environmental investigation, testing and evaluation in support of the remedial work at these sites. The Department of the Navy (DON) has worked in cooperation with the State of California Department of Toxic Substances Control and the Santa Ana Regional Water Quality Control Board as well as with the USEPA in the development of alternatives as well as remedy selection for these sites. We therefore find the ROD sufficient to meet our requirements and are in agreement with the selected remedy for these IR sites.

We wish to thank the Navy for the opportunity to be involved in the work at the Marine Corps Air Facility Tustin. We look forward to working with the Navy and regulatory agencies in the future to insure a thorough cleanup and safe transfer of all DON property comprising the facility.

Sincerely,

A handwritten signature in dark ink, appearing to read "Daniel A. Meer", is written over the typed name.

Daniel A Meer, Chief  
Federal Facilities Branch

Date: 03/14/00

Declaration

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

*Keith Forman*  
Mr. Keith Forman  
Base Realignment and Closure Environmental Coordinator  
Marine Corps Air Facility Tustin

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

*John E. Scandura*  
Mr. John E. Scandura, Chief  
Southern California Operations  
Office of Military Facilities  
Department of Toxic Substances Control

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

*Gerard Thibeault*  
Mr. Gerard Thibeault  
Executive Officer  
Regional Water Quality Control Board, Santa Ana Region

\* OU-2 ROD applies to IRP-2, IRP-9A, IRP-9B, IRP-13E,  
and AOCs: AD-04, AS-6, AS-08, AST-02, AST-04,  
MDA-04, MDA-07, MMS-01, and MWA-3

Date: 07/10/00

## DECLARATION

---

### SITE NAME AND LOCATION

Marine Corps Air Facility (MCAF) Tustin  
Operable Unit (OU)-2

Installation Restoration Program (IRP) Sites: IRP-2, IRP-9, IRP-13E

Areas of Concern (AOCs): AD-04, AS-06, AS-08, AST-02, AST-04, MDA-04,  
MDA-07, MMS-01, MWA-03

Orange County, California

### STATEMENT OF BASIS AND PURPOSE

This decision document presents the selected final remedial action for IRP-2, IRP-9, and IRP-13E and AOCs AD-04, AS-06, AS-08, AST-02, AST-04, MDA-04, MDA-07, MMS-01, and MWA-03 at MCAF Tustin in Orange County, California. The remedial action was developed in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended by the Superfund Amendments and Reauthorization Act of 1986 and, to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan. This Record of Decision (ROD)/Remedial Action Plan (RAP) has also been prepared in accordance with California Health and Safety Code Section 25356.1. This action is based on the administrative record file for these sites/AOCs.

The state of California (through the California Environmental Protection Agency Department of Toxic Substances Control [DTSC] and Santa Ana Regional Water Quality Control Board [RWQCB]) and the United States Environmental Protection Agency (U.S. EPA) agree on the selected remedy.

### DESCRIPTION OF THE SELECTED REMEDY: NO ACTION

No action is the selected remedy for IRP-2, IRP-9, and IRP-13E and AOCs AD-04, AS-06, AS-08, AST-02, AST-04, MDA-04, MDA-07, MMS-01, and MWA-03. In selecting the no action remedy for these sites/AOCs, the Department of the Navy (DON) has determined that the existing condition of the sites/AOCs is protective of human health and the environment.

Removal actions were conducted at MWA-03, IRP-2, IRP-9A, and IRP-9B. The Resource Conservation and Recovery Act action at MWA-03 took place in December 1997 and involved the excavation, transport, and treatment of 285 tons of total petroleum hydrocarbon (TPH)- and polynuclear aromatic hydrocarbon (PAH)-contaminated soil using an on-site thermal desorption unit. The non-time-critical removal action of soil at IRP-2 took place in May 1997. This action involved excavation and treatment of approximately 569 tons of PAH-contaminated soil. A non-time-critical removal action was conducted at IRP-9A between 10 July and 04 September 1997 and at IRP-9B between 14 October 1998 and 05 January 1999. The actions at IRP-9A and IRP-9B involved excavation and treatment of approximately 700 and 6,827 tons of TPH- and

Date: 07/10/00

## Declaration

PAH-contaminated soil, respectively. Human-health risk assessments were performed to evaluate the risks remaining after the removal actions at MWA-03, IRP-02, IRP-9A, and IRP-9B. These assessments showed that the postremoval condition at each site/AOC is protective of human health and the environment.

Soil and groundwater at each of the sites and AOCs included in this OU-2 ROD/RAP were evaluated and were determined to require no further action due to site-specific releases. However, IRP-9, AS-08, MDA-04, and MDA-07 are located near large volatile organic compound plumes that originate from three OU-1 sites (IRP-3, IRP-12, and IRP-13S). Therefore, groundwater at IRP-9, AS-08, MDA-04, and MDA-07 is being addressed as part of the OU-1 remedial action. The need for groundwater cleanup at IRP-9 and AS-08, MDA-04, and MDA-07 will be evaluated in conjunction with remedial action at OU-1 and will be documented in a separate ROD/RAP. DTSC, RWQCB, and U.S. EPA agree with this approach.

No monitoring or deed restrictions are required to address chemicals present in soil and/or groundwater as a result of operations at the no action sites/AOCs. However, use restrictions may be required as part of potential remedial actions associated with OU-1. The need for such restrictions will be addressed in the proposed plan and ROD/RAP for OU-1.

The property containing IRP-9, AS-08, MDA-04, and MDA-07 will not be transferred until the evaluation of OU-1 is complete and remedial action is finalized unless an early transfer is pursued. Institutional controls are anticipated and will be developed in conjunction with an Environmental Restriction Covenant and Agreement. When the Environmental Restriction Covenant and Agreement is finalized, it will be executed by the state and the federal government contemporaneously with the negotiation and execution of the conveyance of the property to the transferee(s) by deed, pursuant to the Defense Base Closure and Realignment Act of 1990, 10 *United States Code* Section 2687 note.


## DECLARATION STATEMENT

The DON has determined that no remedial action is necessary to ensure the protection of human health and the environment at IRP-2, IRP-9, and IRP-13E and AOCs AD-04, AS-06, AS-08, AST-02, AST-04, MDA-04, MDA-07, MMS-01, and MWA-03. This determination was based on extensive field investigations, laboratory analyses, and a thorough assessment of potential human-health risks at each location. Ecological risk assessments were not performed at these sites/AOCs because habitat surveys performed in October and November 1994 and February 1995 showed that there is no suitable wildlife habitat present (BNI 1996i,j). The results of the human-health risk assessments of these sites/AOCs show that the chemicals present at the sites/AOCs do not present an unacceptable risk to human health or the environment. Therefore, no remedial action is required at these sites/AOCs. Because hazardous substances are not present at concentrations above unacceptable levels, CERCLA Section-121 cleanup standards do not apply.

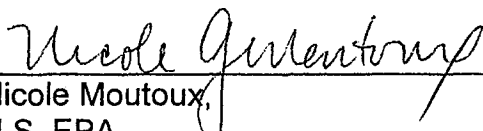
## CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREAS OF CONCERN  
MWA-11A, MWA-11B, TOW-10, MWA-24, TOW-15, MWA-25, TOW-X6, AS-3A, AS-3B, AND AS-3C AT MCAF TUSTIN, CALIFORNIA

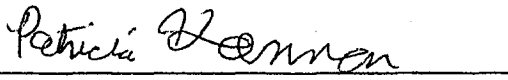
The following members of the BCT concur with the recommendation for no further action for areas of concern (AOC) MWA-11A, MWA-11B, TOW-10, MWA-24, TOW-15, MWA-25, TOW-X6, AS-3A, AS-3B, and AS-3C at MCAF Tustin, California.

  
Keith Forman,  
BRAC Environmental Coordinator

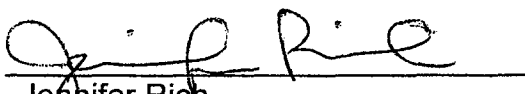
Date: 6/22/00

  
Nicole Moutoux,  
U.S. EPA  
Project Manager

Date: 6/22/00

  
Patricia Hannon,  
RWQCB  
Project Manager

Date: 6/22/00

  
Jennifer Rich,  
CalEPA, DTSC  
Project Manager

Date: 6/22/00



# California Regional Water Quality Control Board

## Santa Ana Region



Winston H. Hickox  
Secretary for  
Environmental  
Protection

Internet Address: <http://www.swrcb.ca.gov/rwqcb8>  
3737 Main Street, Suite 500, Riverside, California 92501-3348  
Phone (909) 782-4130 - FAX (909) 781-6288

Gray Davis  
Governor

May 15, 2000

Mr. Keith Forman, 06CC.KF  
BRAC Environmental Coordinator  
Naval Facilities Engineering Command, SWDIV  
1220 Pacific Hwy  
San Diego CA 92132-5190

### **ABOVEGROUND STORAGE TANK REMOVAL REPORT FOR ABOVEGROUND STORAGE TANK (AST) SITES 27, 28 (28A), 186, 227, 537, 540A, 540B, AND 6169B, MARINE CORPS AIR FACILITY, TUSTIN**

Dear Mr. Forman:

We have completed our review of the above referenced document dated June 9, 1998 and received at this office on July 23, 1998. According to the report, eight ASTs were inspected for leaks and soil samples were collected for analysis, if evidence of leakage (visable surface staining) was found. Please note that AST 28 in the title of the above report is referred to as AST 28A in the text and on the maps. No surface staining was observed around ASTs 27, 28A, 227, 537, 540A, 540B, and 6169B.

At AST168 staining was observed near the tank. Two soil samples were collected: one at the surface and one at one foot below the surface. The soil samples were analyzed for total petroleum hydrocarbons (TPH) as diesel and volatile organic compounds. The laboratory analytical results showed low concentrations of TPH in the surface sample and low concentrations of 2-butanone and acetone in the deeper sample.

Base on the information in the June 9, 1998 Aboveground Storage Tank Removal Report For Aboveground Storage Tank (Ast) Sites 27, 28, 186, 227, 537, 540A, 540B, And 6169B, Marine Corp Air Facility, Tustin, and provided it is accurate and representative of the site conditions, we concur with your request for no further action at the following AST sites 27, 28A, 186, 227, 537, 540A, 540B, And 6169B.

1999 MAY 15 15:13

WATER DIVISION

Mr. Forman

- 2 -

May 15, 2000

If you should have any questions, please call me at (909) 782-4498.

Sincerely,



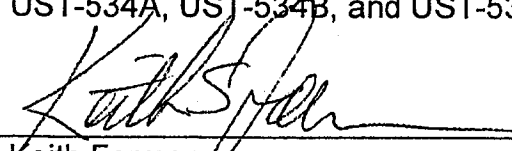
Patricia A. Hannon  
SLIC/DoD/AGT Section

cc: Dept. of Toxic Substances Control - Sharon Fair  
Naval Facility Engineering Command, SWDIV - DeAnna Dunbar  
Orange County Health Care Agency - Quang Tran  
U. S. EPA - Nicole Moutoux

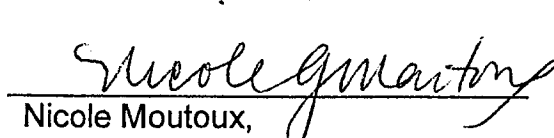
## CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREAS OF CONCERN  
MWA-07, TOW-08A, TOW-08B, UST-186D, MWA-14, TOW-13, UST-183A, MWA-08,  
MMS-06, MMS-08, MGR-02, MCD-02, TOW-14, UST-534A, UST-534B, AND  
UST-534C AT MCAF TUSTIN, CALIFORNIA

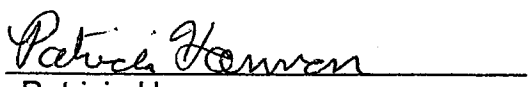
The following members of the BCT concur with the recommendation for no further action for areas of concern (AOC) MWA-07, TOW-08A, TOW-08B, UST-186D, MWA-14, TOW-13, UST-183A, MWA-08, MMS-06, MMS-08, MGR-02, MCD-02, TOW-14, UST-534A, UST-534B, and UST-534C at MCAF Tustin, California.

  
Keith Forman  
BRAC Environmental Coordinator

Date: 4/21/00

  
Nicole Moutoux,  
U.S. EPA  
Project Manager

Date: 4/21/2000

  
Patricia Hannon,  
RWQCB  
Project Manager

Date: 4/21/2000

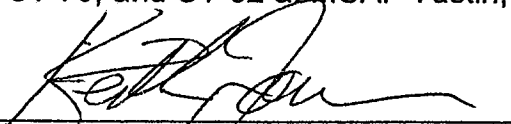
  
Majed Ibrahim,  
Cal-EPA, DTSC  
Project Manager

Date: 4/21/2000


## CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREAS OF CONCERN  
ST-7, ST-8, ST-21C, ST-21D, ST-21E, ST-21F, ST-79, AND ST-82 AT MCAF TUSTIN,  
CALIFORNIA

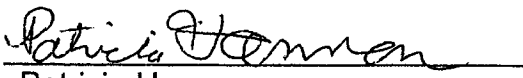
The following members of the BCT concur with the recommendation for no further  
action for areas of concern (AOC) ST-7, ST-8, ST-21C, ST-21D, ST-21E, ST-21F,  
ST-79, and ST-82 at MCAF Tustin, California.

  
Keith Forman,  
BRAC Environmental Coordinator

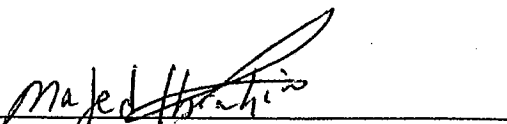
Date: 2/29/00

  
Nicole Moutoux,  
U.S. EPA  
Project Manager

Date: 2/24/00

  
Patricia Hannon,  
RWQCB  
Project Manager

Date: 2/24/00

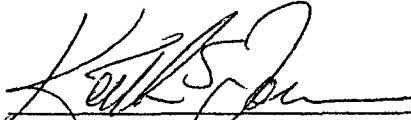
  
Majed Ibrahim,  
Cal-EPA, DTSC  
Project Manager

Date: 2/24/2000

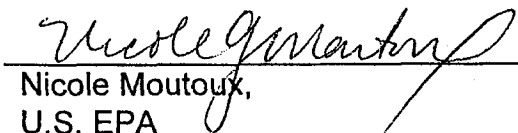
## CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR RCRA-PERMITTED  
HAZARDOUS WASTE STORAGE UNITS KNOWN AS AREAS OF CONCERN  
STD-01 (BUILDING 248), STD-02 (STORAGE BUNKER 23A), AND STD-03  
(STORAGE AREA 567) AT MCAF TUSTIN, CALIFORNIA


The following members of the BCT concur with the recommendation for no further action for RCRA-permitted hazardous waste storage units known as areas of concern (AOC) STD-01 (Building 248), STD-02 (Storage Bunker 23A), and STD-03 (Storage Area 567) at MCAF Tustin, California.

  
\_\_\_\_\_  
Keith Forman,  
BRAC Environmental Coordinator

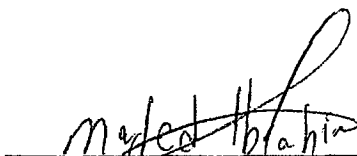
Date: 10/14/99

  
\_\_\_\_\_  
Nicole Moutoux,  
U.S. EPA  
Project Manager

Date: 10/14/99

  
\_\_\_\_\_  
Patricia Hannon,  
RWQCB  
Project Manager

Date: Oct. 14, 1999

  
\_\_\_\_\_  
Majed Ibrahim,  
Cal-EPA, DTSC  
Project Manager

Date: 11/10/1999

## CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREAS OF CONCERN ST-4A, ST-4B, ST-5B, ST-9A, ST-9B, ST-10, ST-11A, ST-11B, ST-17, ST-18C, ST-21A, ST-21B, ST-23, ST-25, ST-26B, ST-27, ST-28A, ST-28B, ST-29, ST-30, ST-31A, ST-31B, ST-33, ST-34B, ST-37A, ST-38A, ST-38B, ST-41A, ST-41B, ST-54, ST-59A, ST-59B, ST-60B, ST-75A, ST-75B, ST-76, AND ST-78 AT MCAF TUSTIN, CALIFORNIA

The following members of the BCT concur with the recommendation for no further action for areas of concern (AOC) ST-4A, ST-4B, ST-5B, ST-9A, ST-9B, ST-10, ST-11A, ST-11B, ST-17, ST-18C, ST-21A, ST-21B, ST-23, ST-25, ST-26B, ST-27, ST-28A, ST-28B, ST-29, ST-30, ST-31A, ST-31B, ST-33, ST-34B, ST-37A, ST-38A, ST-38B, ST-41A, ST-41B, ST-54, ST-59A, ST-59B, ST-60B, ST-75A, ST-75B, ST-76, and ST-78 at MCAF Tustin, California.



Keith Forman,  
BRAC Environmental Coordinator

Date: 9/24/99



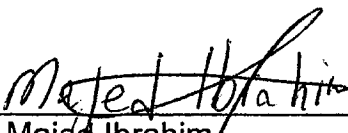
Nicole Moutoux,  
U.S. EPA  
Project Manager

Date: 9/24/99



Patricia Hannon,  
RWQCB  
Project Manager

Date: 9/24/99



Majed Ibrahim,  
Cal-EPA, DTSC  
Project Manager

Date: 9/24/99



ston H. Bickox  
Secretary for  
Environmental  
Protection

# California Regional Water Quality Control Board

## Santa Ana Region



Gray Davis  
Governor

Internet Address: <http://www.swrcb.ca.gov/~rwqcb8>  
3737 Main Street, Suite 500, Riverside, California 92501-3339  
Phone (909) 782-4130 • FAX (909) 781-6288

USF-133-B

April 13, 1999

Mr. Wayne D. Lee  
Assistant Chief of Staff  
Environment and Safety  
Marine Corps Air Station El Toro  
P. O. Box 95001  
Santa Ana CA 92709-5001

### TANK CLOSURE REPORT FOR UNDERGROUND STORAGE TANK 133B, MARINE CORPS AIR FACILITY, TUSTIN

Dear Mr. Lee:

We have completed our review of the above report dated July 24, 1998. According to the report no release from the underground storage tank was found. Based on the information in the report and with the provision that the information provided to this agency was accurate and representative of site conditions, no further action related to this underground storage tank case is required.

If you should have any questions, please call me at (909) 782-4498.

Sincerely,

Patricia A. Hannon  
DoD Section

cc: Dept. of Toxic Substances Control - Juan Jimenez  
MCAF Tustin - Officer-in-Charge  
Naval Facility Engineering Command, SWDIV - Jose Payne  
State Water Resources Control Board, CWP - John Adams  
U. S. EPA, Region IX - Nicole Moutoux  
IT Corporation - Marcus Smith

**California Regional Water Quality Control Board****Santa Ana Region**

Internet Address: <http://www.swrcb.ca.gov/~rwqcb8>  
3737 Main Street, Suite 500, Riverside, California 92501-3339  
Phone (909) 782-4130 • FAX (909) 781-6288



Gray Davis  
Governor

Anton H. Hickox  
Secretary for  
Environmental  
Protection

March 22, 1999

Mr. Wayne D. Lee  
Assistant Chief of Staff  
Environment & Safety  
MCAS EL Toro  
P. O. Box 95001  
Santa Ana, CA 92709-5001

**SUBJECT: CLOSURE OF UNDERGROUND STORAGE TANK (UST) CASE  
UST SITE 23C, MARINE CORPS AIR FACILITY TUSTIN  
CASE NO. 083003205T**

Dear Mr. Lee:

This letter confirms the completion of the site investigation and remedial action which were required to mitigate the releases from the underground storage tank formerly located at the above described location. Enclosed is the Case Closure Summary for the referenced site for your records.

One 500 gallon UST was excavated and removed. Approximately 177 tons of fuel contaminated soil was excavated and treated at the on-Station thermal desorption unit. The excavation was approximately 16 by 28 feet and 9.5 feet deep. Eleven soil samples were collected from the bottom and the side walls of the excavation. The treated soil and the non-impacted overburden soil were used to backfill the excavation.

Based on the Site Assessment/Closure Report, UST Site 23C, dated March 20, 1998, and with the provision that the information provided to this agency was accurate and representative of site conditions, no further action related to the underground storage tank release is required.

This notice is issued pursuant to a regulation contained in Title 23, California Code of Regulations, Division 3, Chapter 16, Section 2721 (e).

Mr. Lee

- 2 -

March 22, 1999

Please telephone Patricia Hannon at (909) 782-4498, if you have any questions regarding this matter.

Sincerely,

*Gerard J. Thibeault*

for Gerard J. Thibeault  
Executive Officer

Attachment: Case Closure Summary

cc w/ attachment: Dept. of Toxic Substances Control - Juan Jimenez  
MCAF Tustin - Officer-in-Charge  
Naval Facility Engineering Command, SWDIV - Jose Payne  
State Water Resources Control Board, CWP - John Adams  
U. S. EPA, Region IX - Nicole Moutoux  
The IT Group - Marcus Smith

BRAC OFFICE

MAR 23 3 08 PM '99

*California Environmental Protection Agency*

# CASE CLOSURE SUMMARY

## Leaking Underground Fuel Tank Program

**I. Agency Information**

DATE: March 17, 1999

|                |  |       |                                 |
|----------------|--|-------|---------------------------------|
| AGENCY NAME    | California Regional Water Quality Control Board - Santa Ana Region | STAFF | Patricia Hamon                  |
| ADDRESS        | 3737 Main St Suite 500   | TITLE | Associate Engineering Geologist |
| CITY/STATE/ZIP | Riverside CA 92501-3339  | PHONE | (909) 782-4498, main # 782-4130 |

**II. Case Information**

|  |  |                     |                          |                 |
|--|--|---------------------|--------------------------|-----------------|
| SITE NAME                              | MCAF Tustin, UST Site 23C  |                     |                          |                 |
| LOCATION                               | approximately 500 feet south of Moffett Drive and 500 feet West of Jamboree Rd. overpass |                     |                          |                 |
| REGIONAL BOARD CASE #                  | 083003205T   | LOCAL AGENCY CASE # | NA                       |                 |
| RESPONSIBLE PARTIES                    | ADDRESS  |                     | PHONE NUMBER             |                 |
| U.S. Marine Corps Air Facility, Tustin | P.O. Box 95001   |                     |                          |                 |
| contact: Wayne Lee                     | Santa Ana CA 92709-5001  |                     |                          |                 |
| TANK NO.                               | SIZE IN GALLONS  | CONTENTS            | CLOSED IN PLACE/ REMOVED | DATE            |
| 23C                                    | 500  | diesel/gasoline     | removed                  | 10 October 1997 |
|  |  |                     |                          |                 |

**III. Release and Site Characterization Information**

|  |                 |   |                     |                               |                 |
|--|-----------------|---|---------------------|-------------------------------|-----------------|
| MONITORING WELLS INSTALLED?                            | no              | NUMBER  | NA                  | PROPER SCREEN INTERVAL?       |                 |
| DEEPEST GW DEPTH                                       |                 |   | SHALLOWEST GW DEPTH |                               |                 |
| GROUNDWATER, MOST SENSITIVE CURRENT USE:               |                 | municipal   | GW FLOW DIRECTION   |                               |                 |
| DRINKING WATER WELL(S) AFFECTED?                       | no              | AQUIFER NAME  |                     |                               |                 |
| IS SURFACE WATER AFFECTED?                             | no              | NEAREST/AFFECTED SW NAME  |                     |                               |                 |
| OFF-SITE BENEFICIAL USE IMPACTS (ADDRESSES/LOCATIONS): |                 |   | none                |                               |                 |
| REPORT(S) ON FILE?                                     | yes             | WHERE IS/ARE REPORT(S) FILED?                                       |                     | R.W.Q.C.B. - Santa Ana Region |                 |
| TREATMENT AND DISPOSAL OF AFFECTED MATERIAL            |                 |   |                     |                               |                 |
| MATERIAL   | AMOUNT          | ACTION (TREATMENT, DISPOSAL)/ DESTINATION                           |                     |                               | DATE            |
| TANK/PIPING  | tank and piping | Erickson, Inc., Fontana   |                     |                               | 10 October 1997 |
| FREE PRODUCT   | none            |   |                     |                               |                 |
| SOIL   | 177 tons        | excavated, contaminated soil treated in a thermal desorbition unit. |                     |                               | October 1997    |
| GROUNDWATER  |                 |   |                     |                               |                 |

Case Closure Summary  
 Site Name: USMCAF Tustin UST Site 23C

Date: March 17, 1999  
 Case #: 083003205T

### I. Release and Site Characterization Information (Continued)

| Maximum Document Contaminant Concentration - Before and After Cleanup |              |          |              |         |
|---|--------------|----------|--------------|---------|
| CONTAMINANT   | SOIL (mg/kg) |          | WATER (µg/L) |         |
|   | INITIAL      | CURRENT  | INITIAL      | CURRENT |
| BENZENE   | NA           | ND<0.081 | NA           | NA      |
| TOLUENE   | NA           | ND<0.081 | NA           | NA      |
| ETHYLBENZENE  | NA           | ND<0.081 | NA           | NA      |
| XYLENE  | NA           | 0.250    | NA           | NA      |
| MTBE  | NA           | ND<0.065 | NA           | NA      |
| TPH - G   | NA           | ND<14    | NA           | NA      |
| TPH - D   | NA           | ND<14    | NA           | NA      |
| TPH   | NA           | 1200     | NA           | NA      |

**COMMENTS REGARDING INVESTIGATION AND REMEDIATION**

One 500 gallon UST was excavated and removed. Approximately 177 tons of fuel contaminated soil was excavated and treated at the on Station thermal desorption unit. The excavation was approximately 16 by 28 feet and 9.5 feet deep. Eleven soil samples were collected from the bottom and the side walls of the excavation. The treated soil and the non-impacted overburden soil were used to backfill the excavation.

Based on the information in Site Assessment/Closure Report, UST site 23C, dated 03/20/98 Revised 9/29/98

This case is recommended for closure.

### V. Closure

|  |                       |      |                 |      |
|--|-----------------------|------|-----------------|------|
| DOES COMPLETED CORRECTIVE ACTION PROTECT <i>EXISTING</i> BENEFICIAL USES PER REGIONAL BOARD BASIN PLAN?      |                       |      |                 | yes  |
| DOES COMPLETED CORRECTIVE ACTION PROTECT <i>POTENTIAL</i> BENEFICIAL USES PER THE REGIONAL BOARD BASIN PLAN? |                       |      |                 | yes  |
| MONITORING WELLS   | NUMBER DECOMMISSIONED | none | NUMBER RETAINED | none |
| LIST ENFORCEMENT ACTIONS TAKEN   | none                  |      |                 |      |
| LIST ENFORCEMENT ACTIONS RESCINDED   | none                  |      |                 |      |

### V. Regional Board Representative Data

|            |                           |       |                                 |
|------------|---------------------------|-------|---------------------------------|
| STAFF      | Patricia Hannon           | TITLE | Associate Engineering Geologist |
| SIGNATURE  | <i>Patricia Hannon</i>    | DATE  | 3/17/99                         |
| SUPERVISOR | Michael Adackapara        | TITLE | Senior WRC Engineer             |
| SIGNATURE  | <i>Michael Adackapara</i> | DATE  | 3/17/99                         |


85

**CONCURRENCE SIGNATURE PAGE****CONCURRENCE WITH NO FURTHER ACTION FOR AREA OF CONCERN MRR-01  
AT MCAF TUSTIN, CALIFORNIA**

The following members of the BCT concur with the recommendation for no further action for area of concern (AOC) MRR-01 at MCAF Tustin, California.

  
Desiree Chandler,  
BRAC Environmental Coordinator

Date: 12/03/97

  
~~Nicole Moutoux~~, GLENN KISTNER  
U.S. EPA  
Project Manager

Date: 12/03/97

  
Larry Vitale,  
RWQCB  
Project Manager

Date: 1/21/98

  
Ron Okuda  
Cal-EPA, DTSC  
Project Manager

Date: 12/03/97

STATE OF CALIFORNIA—CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

PETE WILSON, Governor

## CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

## SANTA ANA REGION

37 MAIN STREET, SUITE 500

RIVERSIDE, CA 92501-3339

TELEPHONE: (909) 782-4130

FAX: (909) 781-8288



August 11, 1997

Mr. Wayne D. Lee  
Assistant Chief of Staff  
Environment and Safety  
Marine Corps Air Station El Toro  
P.O. Box 95001  
Santa Ana, CA 92709-5001

CASE CLOSURE, FORMER UNDERGROUND STORAGE TANK SITES 11 AND 7 MARINE  
CORPS AIR STATION TUSTIN

Dear Mr. Lee:

This letter confirms the completion of site investigations and remedial actions for the subject underground storage tank sites. Based on the information provided in the Site Assessment/Closure Reports Underground Storage Tank Sites 11 and Site 7 dated 7/11/97 and 7/7/97 and with the provision that the information provided to this agency was accurate and representative of site conditions, no further action related to the aboveground storage tank release is required.

This notice is issued pursuant to a regulation contained in Title 23, Division 3, Chapter 16, Section 2721(e) of the California Code of Regulations.

If you have any questions regarding this matter, please contact Lawrence Vitale at (909) 782-4998.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gerard J. Thibeault'.

For Gerard J. Thibeault  
Executive Officer

cc: LT. Hope Katcharian, Marine Corps Air Station El Toro  
Mr. Bill Diekman, Orange County Health Care Agency  
Mr. John Adams Jr., State Water Resources Control Board, Division of Clean  
Water Programs

## CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREAS OF CONCERN AD-01,  
AD-02, AD-03, AMBP-01, AMHP-01, AMS-04, AMS-07, AMS-09, AMS-10, AMS-  
11, AMS-12, AMW-01, AST-03, DI-01, DSD-02, DSD-04, DSD-08, MDA-01,  
MDA-03, MDA-05, MDA-08, MDA-09, and SAT-05 AT MCAS TUSTIN,  
CALIFORNIA

The following members of the BCT concur with the recommendations for no further action for areas of concern (AOCs) AD-01, AD-02, AD-03, AMBP-01, AMHP-01, AMS-04, AMS-07, AMS-09, AMS-10, AMS-11, AMS-12, AMW-01, AST-03, DI-01, DSD-02, DSD-04, DSD-08, MDA-01, MDA-03, MDA-05, MDA-08, MDA-09, and SAT-05 at MCAS Tustin, California.

Desire Chandler

Desire Chandler,  
BRAC Environmental Coordinator

Date: 7/24/97

Nicole Moutoux

Nicole Moutoux,  
U.S. EPA  
Project Manager

Date: 7/24/97

Larry Vitale

Larry Vitale,  
RWQCB  
Project Manager

Date: 7/24/97

Majed Ibrahim

Majed Ibrahim,  
Cal-EPA, DTSC  
Project Manager

Date: 7/23/97



**COUNTY OF ORANGE  
HEALTH CARE AGENCY**

**PUBLIC HEALTH  
DIVISION OF ENVIRONMENTAL HEALTH**

TOM URAM

DEPUTY DIR.

HUGH F. STALLWORTH, M.D.  
HEALTH OFFICER

JACK MILLER, REHS  
DEPUTY DIR.

MAILING ADDRESS:  
2009 EAST EDINGER AVENUE  
SANTA ANA, CA 92705-4117

TELEPHONE: (714) 667-3713  
FAX: (714) 971-0711

June 6, 1997

LT. Hope Katcharian  
Director, Environmental Engineering Division  
Commanding General  
AC/S Environmental IAU  
Marine Corps Air Station El Toro  
P.O. Box 95001  
Santa Ana, CA 92709-5001

Subject: Completion of Tank Removal Project

RE: Marine Corps Air Station Tustin  
Tank #134  
Tustin, CA 92710

Dear Lt. Katcharian:

This is in response to your request for a confirmation of the completion of the tank removal project. With the provision that the results for the soil samples obtained during the tank removal on March 30 and May 6, 1993, were accurate and representative of existing conditions, it is the position of this office that no significant soil contamination has occurred at the above noted facility location.

It should be pointed out that this letter does not relieve you of any responsibilities mandated under the California Health and Safety Code if additional or previously unidentified contamination is discovered at the subject site.

If you have any questions regarding this matter, please contact Arghavan Rashidi-Fard at (714) 667-3713.

Sincerely,

William J. Diekmann, M.S., REHS  
Supervising Hazardous Waste Specialist  
Hazardous Materials Management Section  
Environmental Health Division

cc: Larry Vitale, Santa Ana Regional Water Quality Control Board



**COUNTY OF ORANGE  
HEALTH CARE AGENCY**

**PUBLIC HEALTH  
DIVISION OF ENVIRONMENTAL HEALTH**

**TOM URAM**

**DIRECTOR**

**HUGH F. STALLWORTH, M.D.**  
**HEALTH OFFICER**

**JACK MILLER, REHS**  
**DEPUTY DIRECTOR**

**MAILING ADDRESS:**  
**2009 EAST EDINGER AVENUE**  
**SANTA ANA, CA 92705-1111**

**TELEPHONE: (714) 667-3600**  
**FAX: (714) 912-6711**

June 6, 1997

LT. Hope Katcharian  
Director, Environmental Engineering Division  
Commanding General  
AC/S Environmental IAU  
Marine Corps Air Station El Toro  
P.O. Box 95001  
Santa Ana, CA 92709-5001

**Subject: Completion of Tank Removal Project**

**RE: Marine Corps Air Station Tustin**  
**Tanks #172A and 172B**  
**Tustin, CA 92710**

Dear Lt. Katcharian:

This is in response to your request for a confirmation of the completion of the tank removal project. With the provision that the results for the soil samples obtained during the tank removal on March 3 and August 5, 1993, were accurate and representative of existing conditions, it is the position of this office that no significant soil contamination has occurred at the above noted facility location.

It should be pointed out that this letter does not relieve you of any responsibilities mandated under the California Health and Safety Code if additional or previously unidentified contamination is discovered at the subject site.

If you have any questions regarding this matter, please contact Arghavan Rashidi-Fard at (714) 667-3713.

Sincerely,

William J. Diekmann, M.S., REHS  
Supervising Hazardous Waste Specialist  
Hazardous Materials Management Section  
Environmental Health Division

cc: Larry Vitale, Santa Ana Regional Water Quality Control Board



**COUNTY OF ORANGE  
HEALTH CARE AGENCY**

**PUBLIC HEALTH  
DIVISION OF ENVIRONMENTAL HEALTH**

**TOM URAM**  
DIRECTOR

**HUGH F. STALLWORTH, M.D.**  
HEALTH OFFICER

**JACK MILLER, REHS**  
DEPUTY DIRECTOR

MAILING ADDRESS  
2009 EAST EDINGER AVENUE  
SANTA ANA, CA 92705-4720

TELEPHONE: (714) 667-3800  
FAX: (714) 872-0740

June 6, 1997

LT. Hope Katcharian  
Director, Environmental Engineering Division  
Commanding General  
AC/S Environmental IAU  
Marine Corps Air Station El Toro  
P.O. Box 95001  
Santa Ana, CA 92709-5001

**Subject: Completion of Tank Removal Project**

**RE: Marine Corps Air Station Tustin  
Tank #172C (Oil/Water Separator) \*  
Tustin, CA 92710**

Dear Lt. Katcharian:

This is in response to your request for a confirmation of the completion of the tank removal project. With the provision that the results for the soil samples obtained during the tank removal on July 1, 1993, were accurate and representative of existing conditions, it is the position of this office that no significant soil contamination has occurred at the above noted facility location.

It should be pointed out that this letter does not relieve you of any responsibilities mandated under the California Health and Safety Code if additional or previously unidentified contamination is discovered at the subject site.

If you have any questions regarding this matter, please contact Arghavan Rashidi-Fard at (714) 667-3713.

Sincerely,

William J. Dickmann, M.S., REHS  
Supervising Hazardous Waste Specialist  
Hazardous Materials Management Section  
Environmental Health Division

cc: Larry Vitale, Santa Ana Regional Water Quality Control Board

\* Also known as TDW-04



**COUNTY OF ORANGE  
HEALTH CARE AGENCY**

**PUBLIC HEALTH  
DIVISION OF ENVIRONMENTAL HEALTH**

**TOM URAM**

DEPUTY

**HUGH F. STALLWORTH, M.D.**  
HEALTH OFFICER

**JACK MILLER, REHS**  
DEPUTY DIRECTOR

MAILING ADDRESS:  
2009 EAST EDINGER AVENUE  
SANTA ANA, CA 92705-4700

TELEPHONE: (714) 667-3713  
FAX: (714) 972-3711

June 6, 1997

LT. Hope Katcharian  
Director, Environmental Engineering Division  
Commanding General  
AC/S Environmental IAU  
Marine Corps Air Station El Toro  
P.O. Box 95001  
Santa Ana, CA 92709-5001

Subject: **Completion of Tank Removal Project**

RE: Marine Corps Air Station Tustin  
Tank #184  
Tustin, CA 92710

Dear Lt. Katcharian:

This is in response to your request for a confirmation of the completion of the tank removal project. With the provision that the results for the soil samples obtained during the tank removal on March 30, 1993, were accurate and representative of existing conditions, it is the position of this office that no significant soil contamination has occurred at the above noted facility location.

It should be pointed out that this letter does not relieve you of any responsibilities mandated under the California Health and Safety Code if additional or previously unidentified contamination is discovered at the subject site.

If you have any questions regarding this matter, please contact Arghavan Rashidi-Fard at (714) 667-3713.

Sincerely,

William J. Diekmann, M.S., REHS  
Supervising Hazardous Waste Specialist  
Hazardous Materials Management Section  
Environmental Health Division

cc: Larry Vitale, Santa Ana Regional Water Quality Control Board



**COUNTY OF ORANGE  
HEALTH CARE AGENCY**

**PUBLIC HEALTH  
DIVISION OF ENVIRONMENTAL HEALTH**

TOM URAM

DIRECTOR

HUGH F. STALLWORTH, M.D.  
HEALTH OFFICER

JACK MILLER, REHS  
DEPUTY DIRECTOR

MAILING ADDRESS:  
2009 EAST EDINGER AVENUE  
SANTA ANA, CA 92705-4777

TELEPHONE: (714) 667-3611  
FAX: (714) 972-6100

June 6, 1997

LT. Hope Katcharian  
Director, Environmental Engineering Division  
Commanding General  
AC/S Environmental 1AU  
Marine Corps Air Station El Toro  
P.O. Box 95001  
Santa Ana, CA 92709-5001

Subject: Completion of Tank Removal Project

RE: Marine Corps Air Station Tustin  
Tank #213  
Tustin, CA 92710

Dear Lt. Katcharian:

This is in response to your request for a confirmation of the completion of the tank removal project. With the provision that the results for the soil samples obtained during the tank removal on March 30, 1993, were accurate and representative of existing conditions, it is the position of this office that no significant soil contamination has occurred at the above noted facility location.

It should be pointed out that this letter does not relieve you of any responsibilities mandated under the California Health and Safety Code if additional or previously unidentified contamination is discovered at the subject site.

If you have any questions regarding this matter, please contact Arghavan Rashidi-Fard at (714) 667-3713.

Sincerely,

William J. Diekmann, M.S., REHS  
Supervising Hazardous Waste Specialist  
Hazardous Materials Management Section  
Environmental Health Division

cc: Larry Vitale, Santa Ana Regional Water Quality Control Board



**COUNTY OF ORANGE  
HEALTH CARE AGENCY**

**PUBLIC HEALTH  
DIVISION OF ENVIRONMENTAL HEALTH**

**TOM URAM**  
DIRECTOR

**HUGH F. STALLWORTH, M.D.**  
HEALTH OFFICER

**JACK MILLER, REHS**  
DEPUTY DIRECTOR

MAILING ADDRESS:  
2009 EAST EDINGER AVENUE  
SANTA ANA, CA 92705-4731

TELEPHONE: (714) 667-3600  
FAX: (714) 972-0744

June 6, 1997

LT. Hope Katcharian  
Director, Environmental Engineering Division  
Commanding General  
AC/S Environmental IAU  
Marine Corps Air Station El Toro  
P.O. Box 95001  
Santa Ana, CA 92709-5001

Subject: Completion of Tank Removal Project

RE: Marine Corps Air Station Tustin  
Tank #249  
Tustin, CA 92710

Dear Lt. Katcharian:

This is in response to your request for a confirmation of the completion of the tank removal project. With the provision that the results for the soil samples obtained during the tank removal on April 1, 1993, were accurate and representative of existing conditions, it is the position of this office that no significant soil contamination has occurred at the above noted facility location.

It should be pointed out that this letter does not relieve you of any responsibilities mandated under the California Health and Safety Code if additional or previously unidentified contamination is discovered at the subject site.

If you have any questions regarding this matter, please contact Arghavan Rashidi-Fard at (714) 667-3713.

Sincerely,

William J. Diekmann, M.S., REHS  
Supervising Hazardous Waste Specialist  
Hazardous Materials Management Section  
Environmental Health Division

cc: Larry Vitale, Santa Ana Regional Water Quality Control Board

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SANTA ANA REGION

MAIN STREET, SUITE 500  
SANTA ANA, CA 92701-3339  
PHONE: (909) 782-4130  
FAX: (909) 781-6288

March 31, 1997

Mr. Wayne D. Lee  
Assistant Chief of Staff  
Environment and Safety  
Marine Corps Air Station El Toro  
P.O. Box 95001  
Santa Ana, CA 92709-5001

SUBJECT: CASE CLOSURES FORMER UNDERGROUND STORAGE TANK SITES 3,  
5 AND 35, MARINE CORPS AIR STATION TUSTIN

Dear Mr. Lee:

This letter confirms the completion of site investigations and remedial actions for the subject underground storage tank sites. Based on the information provided in the Site Assessment/Closure Report Underground Storage Tank Site 3 and Site 35 dated 2/28/97 and Site Assessment/Closure Report Underground Storage Tank Site 5 dated 2/7/97 and with the provision that the information provided to this agency was accurate and representative of site conditions, no further action related to the underground storage tank releases is required.

This notice is issued pursuant to a regulation contained in Title 23, Division 3, Chapter 16, Section 2721(e) of the California Code of Regulations.

If you have any questions regarding this matter, please contact Lawrence Vitale at (909) 782-4998.

Sincerely,

A handwritten signature in dark ink, appearing to read "Gerard J. Thibeault", is written over a horizontal line.

for Gerard J. Thibeault  
Executive Officer

cc: LT. Hope Katcharian, Marine Corps Air Station El Toro  
Mr. Bill Diekman, Orange County Health Care Agency  
Mr. John Adams Jr., State Water Resources Control Board, Division of Clean

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SANTA ANA REGION

MAIN STREET, SUITE 500

SANTA ANA, CA 92701-3339

PHONE: (909) 782-4130

FAX: (909) 781-6283



January 27, 1997

Mr. Wayne D. Lee  
Assistant Chief of Staff  
Environmental and Safety  
Marine Corps Air Station El Toro  
P.O. Box 95001  
Santa Ana, CA 92709-5001

SUBJECT: CASE CLOSURES, MARINE CORPS AIR STATION TUSTIN, FORMER  
UNDERGROUND STORAGE TANKS SITES,  
9,133,161,177,183,186(A,B,C)

Dear Mr. Lee:

This letter confirms the completion of site investigations and remedial actions for the subject underground storage tank sites. Based on the information provided in the Site Assessment/ Closure Report dated 12/13/96 and with the provision that the information provided to this agency was accurate and representative of site conditions, no further action related to the underground storage tank releases is required.

This notice is issued pursuant to a regulation contained in Title 23, Division 3, Chapter 16, Section 2721(e) of the California Code of Regulations.

If you have any questions, regarding this matter, please contact Lawrence Vitale at (909) 782-4998.

Sincerely,

A handwritten signature in dark ink, appearing to read "Gerard J. Thibeault", is written over a horizontal line.

Gerard J. Thibeault  
Executive Officer

cc: LT Hope Katcharian, Marine Corps Air Station El Toro  
Mr. Bill Diekman, Orange County Health Care Agency  
Mr. John Adams Jr., State Water Resources Control Board, Division of Clean  
Water Programs

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SANTA ANA REGION

MAIN STREET, SUITE 500  
SANTA ANA, CA 92701-3339  
PHONE: (909) 782-4130  
(909) 781-6288



January 27, 1997

Mr. Wayne D. Lee  
Assistant Chief of Staff  
Environmental and Safety  
Marine Corps Air Station El Toro  
P.O. Box 95001  
Santa Ana, CA 92709-5001

SUBJECT: CASE CLOSURES, MARINE CORPS AIR STATION TUSTIN, FORMER  
UNDERGROUND STORAGE TANKS SITES, 10A, 132, 28A, 506

Dear Mr. Lee:

This letter confirms the completion of site investigations and remedial actions for the subject underground storage tank sites. Based on the information provided in the Site Assessment/ Closure Reports dated 12/6/96, 12/13/96 and 12/16/96 and with the provision that the information provided to this agency was accurate and representative of site conditions, no further action related to the underground storage tank releases is required.

This notice is issued pursuant to a regulation contained in Title 23, Division 3, Chapter 16, Section 2721(e) of the California Code of Regulations.

If you have any questions, regarding this matter, please contact Lawrence Vitale at (909) 782-4998.

Sincerely,

Gerard J. Thibeault  
Executive Officer

cc: LT Hope Katcharian, Marine Corps Air Station El Toro  
Mr. Bill Diekman, Orange County Health Care Agency  
Mr. John Adams Jr., State Water Resources Control Board, Division of Clean  
Water Programs

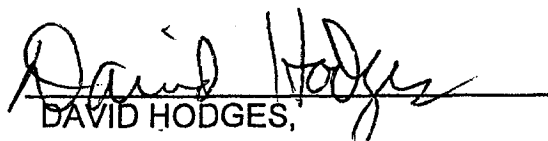
**CONCURRENCE SIGNATURE PAGE**

CONCURRENCE WITH NO FURTHER ACTION FOR AREAS OF CONCERN  
AMS-05, AMS-06, AMS-13, AS-01, AS-02, AS-04, AS-05, AS-07, AST-01, MMS-02, MWA-23, SAT-14, ST-68, ST-68A, ST-73 and MAE-04A, ST-74, TOW-X5, and TOW-16, AT MCAS TUSTIN, CALIFORNIA

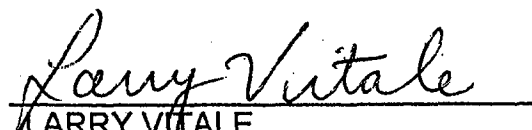
The following members of the BCT concur with the recommendations for No Further Action for areas of concern (AOCs) AMS-05, AMS-06, AMS-13, AS-01, AS-02, AS-04, AS-05, AS-07, AST-01, MMS-02, MWA-23, SAT-14, ST-68, ST-68A, ST-73 and MAE-04A, ST-74, TOW-X5, and TOW-16 at MCAS Tustin, California:

  
DESIRE CHANDLER,  
BRAC Environmental Coordinator


Date: 9/16/96

  
DAVID HODGES,  
U.S. EPA  
Project Manager

Date: 9/16/96

  
LARRY VITALE,  
RWQCB  
Project Manager

Date: 9/16/96

  
MAJED IBRAHIM  
Cal-EPA, DTSC  
Project Manager

Date: 9/16/96



BECHTEL NATIONAL INC.

# CLEAN II TRANSMITTAL/DELIVERABLE RECEIPT

Contract No. N-68711-92-D-4670

Document Control No. CTO-0085/0210

File Code: 0215.0218.1

TO: Commanding Officer  
 Naval Facilities Engineering Command  
 Southwest Division  
 Mr. Paul Kennedy, Code 0233  
 Building 128  
 1220 Pacific Highway  
 San Diego, California 92132-5187

DATE: July 15, 1996

CTO #: 0085

LOCATION: MCAS Tustin

FROM:

  
 Program / Project Manager

Operations Manager

DESCRIPTION: Draft Final Pesticides (and Associated Metals) Investigation Report dated July 1996

TYPE: ☐ Contract Deliverable ☒ CTO Deliverable ☐ Change Notice/Project  
☐ Other Note

VERSION: Draft Final REVISION #: n/a  
 (e.g., Draft, Draft Final, Final, etc.)

ADMIN RECORD: Yes ☒ No ☐ Category Confidential ☐  
 (Comm. Rel. to Identify)

SCHEDULED DELIVERY DATE: 07/19/96 ACTUAL DELIVERY DATE: 7/17/96

NUMBER OF COPIES SUBMITTED: 10/4C/5E

COPIES TO (Include Name, Navy Mail Code, and No. of Copies):

## SWDIV:

Mary Nuzum, 185C3 (1C/1E)

Terry Martin, 1831.TM (1C/1E)

DeAnna Dunbar, 1831.DD (1C/2E)

Virginia Garelick, 1852.VG (1C/1E)

## BECHTEL:

J. W. Kluesener (1C)

H. N. Masri (1C/1E)

S. L. Reackhof (1C/1E)

C. Gardinier (1C/1E)

J. Davidson - AR&amp;IR (3C/3E)

PDCC file (1C/1E)

SFRO file (1C/1E)

## OTHER (Distribution done by Bechtel):

D. Chandler, MCAS Tustin (1C/1E)

L. Bucago, MCAS Tustin (1C/1E)

D. Hodges, USEPA (1C/1E)

M. Ibrahim, DTSC (1C/1E)

L. Vitale, RWQCB (1C/1E)

Date/Time Received

If "Yes" copy J. Davidson (AR only - 2); (AR&amp;IR - 3)

256 01 96 7/17

# Bechtel

45 Fremont Street  
San Francisco, CA 94105-1895  
Mailing address: P.O. Box 193965  
San Francisco, CA 94119-3965

CLEAN II Program  
Bechtel Job No. 22214  
Contract No. N68711-92-D-4670  
File Code: 0218.4

IN REPLY REFERENCE: CTO-0085/0214

July 15, 1996

U.S. Environmental Protection Agency  
75 Hawthorne Street (H-9-2)  
San Francisco, California 94105-3901  
Attention: *Dave Hodges, Project Manager (1 copy)*

California Environmental Protection Agency  
Department of Toxic Substances Control  
245 West Broadway, Suite 425  
Long Beach, California 90802-4444  
Attention: *Majed Ibrahim, Project Manager (1 copy)*

California Environmental Protection Agency  
Regional Water Quality Control Board  
3737 Main Street, Suite 500  
Riverside, California 92501-3339  
Attention: *Larry Vitale, Project Manager (1 copy)*

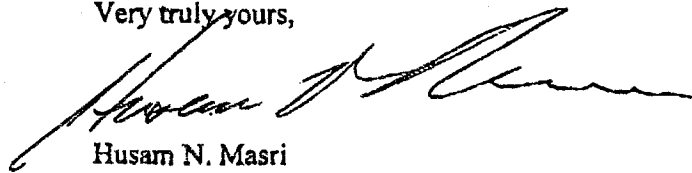
Subject: Draft Final Pesticides (and Associated Metals) Investigation Report  
dated July 1996

Dear Gentlemen:

Per direction of DeAnna Dunbar (Remedial Project Manager), enclosed please find the Draft Final Pesticides (and Associated Metals) Investigation Report incorporating agreed upon revisions. The revisions are the result of the June 26, 1996 meeting with SWDIV and agency representatives. At that meeting, comments were resolved and, therefore, this draft final document should be the final submittal.

Should you have any questions, please call me at (415) 768-4612 or Cathie Gardinier at (415) 768-2766.

Very truly yours,



Husam N. Masri  
Project Manager  
MCAS Tustin

HNH/KEB:aqr  
Enclosures

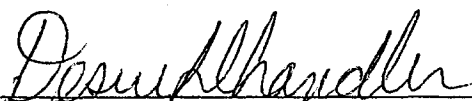


**Bechtel National, Inc.** Systems Engineers-Constructors

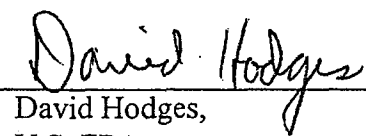
## CONCURRENCE SIGNATURE PAGE

CONCURRENCE WITH NO FURTHER ACTION FOR AREAS OF CONCERN AMS-01,  
AMS-02, AMS-03, MCD-03, ST-58, ST-62, ST-63, ST-64, ST-65, ST-66, ST-69, ST-70,  
and ST-71 AT MCAS TUSTIN, CALIFORNIA

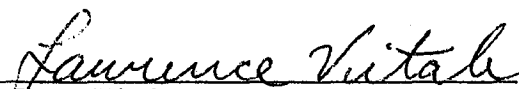
The following members of the BCT concur with the recommendations for no further action for  
areas of concern (AOCs) AMS-01, AMS-02, AMS-03, MCD-03, ST-58, ST-62, ST-63, ST-64,  
ST-65, ST-66, ST-69, ST-70, and ST-71 at MCAS Tustin, California

  
Desire Chandler,  
BRAC Environmental Coordinator

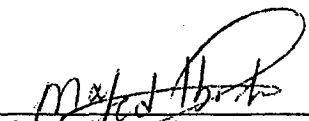
date: 22 April 96

  
David Hodges,  
U.S. EPA  
Project Manager

date: 4/22/96

  
Larry Vitale,  
RWQCB  
Project Manager

date: 4/22/96

  
Majed Ibrahim  
Cal-EPA, DTSC  
Project Manager

date: 4/22/96

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 6

West Broadway, Suite 350  
Beech, CA 90602-4444

May 26, 1992

J.R. Faunce, CAPT, CEC, USN  
Director, Facilities Management  
Marine Corps Air Station  
El Toro (Santa Ana), California

Dear Captain Faunce:

REVIEW AND APPROVAL OF PRELIMINARY ENDANGERMENT ASSESSMENT (PEA)  
REPORT - PARCEL A, MCAS TUSTIN

The Department has reviewed the above mentioned report prepared by GeoRemediation, Inc. for the United States Navy, dated March 6, 1992. This report addressed the comments on a previous report dated October 17, 1991, and provided to you on January 21, 1992. The Department hereby approves said report in its totality as it complies with Section 25319.5, Chapter 6.8, Division 20 of the California Health and Safety Code.

The Department received a letter from L. J. Howard of your staff, dated May 7, 1992, requesting Department's concurrence with the following:

- No further action with regard to pesticides is necessary.
- Concentrations of Total Petroleum Hydrocarbons (TPH) found pose no significant environmental or health risk for currently existing conditions or following development activities and that no further action is required.
- No further action with regard to groundwater contamination is required prior to proceeding with construction. Further investigation of groundwater contamination in general at MCAS Tustin will be performed in conjunction with the Installation Restoration Program and Resource Conservation and Recovery Act Program.

The Department concurs that no further action regarding pesticides is necessary at this site for soil. The Department concurs that concentrations of (TPH) found pose no significant environmental or health risk for currently existing conditions or following development activities and that no further action is required. The Department concurs that no further action with regard to groundwater contamination is required prior to proceeding with construction. However, further investigation of groundwater contamination in general at MCAS Tustin must be performed in conjunction with the Installation Restoration Program and Resource Conservation and Recovery Act Program.

MAY-29-92 FRI 13 42 ENVIRONMENTAL

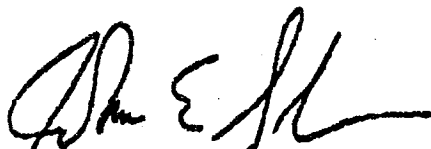
J.R. Faunce, CAPT, CEC, USN

May 26, 1992

Page 2

The Department appreciates your cooperation. If you have any questions or need assistance, please contact Mr. Manny Alonzo at (310) 590-4904.

Sincerely,



John E. Scandura, Chief  
Site Mitigation Branch

cc: Mr. Chris Kyburg, Code 1811.CK  
Southwest Division, Naval Facilities  
Engineering Command  
1220 Pacific Highway  
San Diego, California 92132-5190

Ms. Michelle McKibben  
Department of Toxic Substances Control  
Site Mitigation Branch  
8950 Cal Center Drive, Bldg. 3, Suite 101  
Sacramento, California 95826

STATE OF CALIFORNIA - ENVIRONMENTAL PROTECTION AGENCY

PETE WILSON, Governor

## DEPARTMENT OF TOXIC SUBSTANCES CONTROL

4  
1st Broadway, Suite 380  
Los Angeles, CA 90002-4444

May 27, 1992



J.R. Faunce, CAPT, CEC, USN  
Director, Facilities Management Department  
Marine Corps Air Station (El Toro)  
Santa Ana, California 92709

Dear Captain Faunce:

REVIEW AND APPROVAL OF PRELIMINARY ENDANGERMENT ASSESSMENT (PEA)  
REPORT - PARCEL C NEW FAMILY HOUSING PROJECT, MCAS TUSTIN

The Department has reviewed the above mentioned report prepared by GeoRemediation, Inc. for the United States Navy, dated March 20, 1992. This report addressed the comments on a previous report dated October 17, 1991, provided to you on January 21, 1992. The Department hereby approves said report in its totality as it complies with Section 25319.5, Chapter 6.8, Division 20 of the California Health and Safety Code.

The Department concurs that no further action is necessary at this site regarding pesticide contaminated soil.

If you have any question or need any assistance, please contact Mr. Manny Alonzo at (310) 590-4904.

Sincerely,

  
John E. Scandura, Chief  
Site Mitigation Branch

cc: Mr. Chris Kyburg, Code 1811.CK ✓  
Southwest Division, Naval Facilities  
Engineering Command  
1220 Pacific Highway  
San Diego, California 92132-5190

Ms. Michelle McKibben  
Department of Toxic Substances Control  
Site Mitigation Branch  
8950 Cal Center Drive, Bldg. 3, Suite 101  
Sacramento, California 95826

107-55-5 FRI 13:4 ENVIRONMENTAL

P. 04

STATE OF CALIFORNIA - ENVIRONMENTAL PROTECTION AGENCY

PETE WILSON, Governor

# DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4  
248 West Broadway, Suite 380  
Long Beach, CA 90802-4444

May 27, 1992



J.R. Faunce, CAPT, CEC, USN  
Director, Facilities Management Department  
Marine Corps Air Station  
El Toro (Santa Ana), California 92709

Dear Captain Faunce:

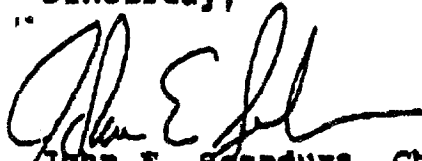
REVIEW AND APPROVAL OF PRELIMINARY ENDANGERMENT ASSESSMENT (PEA)  
REPORT - PARCEL D, NEW FAMILY HOUSING PROJECT, MCAS TUSTIN

The Department has reviewed the above mentioned report prepared by GeoRemediation, Inc. for the United States Navy, dated April 17, 1992. This report addressed the comments on a previous report dated October 17, 1991, provided to you on January 21, 1992. The Department hereby approves said report in its totality as it complies with Section 25319.5, Chapter 6.8, Division 20 of the California Health and Safety Code.

The Department concurs that no further action is necessary at this site regarding pesticide contaminated soil.

If you have any question or need any assistance, please contact Manny Alonzo at (310) 590-4904.

Sincerely,

  
John E. Scandura, Chief  
Site Mitigation Branch

cc: Mr. Chris Kyburg, Code 1811.CK ✓  
Southwest Division, Naval Facilities  
Engineering Command  
1220 Pacific Highway  
San Diego, California 92132-5190

Ms. Michelle McKibben  
Department of Toxic Substances Control  
Site Mitigation Branch  
8950 Cal Center Drive, Bldg. 3, Suite 101  
Sacramento, California 95826

**ATTACHMENT 3**  
**HAZARDOUS SUBSTANCES AND**  
**PETROLEUM PRODUCTS NOTIFICATION TABLES**

Attachment 3  
Hazardous Substances Notification Table

| Parcel Number | AOC         | Hazardous Substances*   | Date(s) of Storage and/or Operation | Stored (S), Released (R), or Disposed (D) of |
|---------------|-------------|---|-------------------------------------|--|
| Parcel 1      | AD-01       | <i>No evidence of a disposal area, covered with landscaping</i>                       | 1946                                | NA   |
| Parcel 1      | AD-02       | <i>PR/VSI indicated no visible/reported releases identified, unit integrity good.</i> | 1953-1958                           | NA   |
| Parcel 1      | AMS-07      | <i>PR/VSI indicated no visible/reported releases identified, unit integrity good.</i> | 1963 to present                     | NA   |
| Parcel 1      | MAW-05      | Known visible well  | unknown                             | NA   |
| Parcel 1      | MAW-07      | <i>PR/VSI indicated no visible/reported releases identified, unit integrity good.</i> | unknown                             | NA   |
| Parcel 1      | ST-7        | Solvents  | 1991 to 1999                        | S  |
| Parcel 1      | ST-8        | Paints  | unknown to 1996                     | S  |
| Parcel 1      | ST-8        | Solvents  | unknown to 1996                     | S  |
| Parcel 1      | ST-9A       | Paints  | 1991-1995                           | S  |
| Parcel 1      | ST-9A       | Solvents  | 1991-1995                           | S  |
| Parcel 1      | ST-9B       | Paints  | unknown to 1991                     | S  |
| Parcel 1      | ST-9B       | Solvents  | unknown to 1991                     | S  |
| Parcel 1      | ST-10       | Solvents  | 1991-1995                           | S  |
| Parcel 1      | ST-10       | Potassium bicarbonate   | 1991-1995                           | S  |
| Parcel 1      | ST-10       | Speedy-Dry absorbent  | 1991-1995                           | S  |
| Parcel 1      | ST-66       | <i>PR/VSI indicated no visible/reported releases identified, unit integrity good.</i> | NA                                  | NA   |
| Parcel 1      | ST-68 (A-C) | <i>PR/VSI indicated no visible/reported releases identified, unit integrity good.</i> | NA                                  | NA   |
| Parcel 1      | ST-82       | <i>PR/VSI indicated no visible/reported releases identified, unit integrity good.</i> | 1992-1999                           | S  |
| Parcel 1      | ST-90       | <i>PR/VSI indicated no visible/reported releases identified, unit integrity good.</i> | 1988-1998                           | S  |
| Parcel 1      | TOW-04      | Solvents  | 1966-1993                           | S,D  |
| Parcel 16     | AMS-02A     | <i>PR/VSI indicated no visible/reported releases identified, unit integrity good.</i> | 1953                                | NA   |
| Parcel 16     | ST-31A      | Thinner   | 1990-1995                           | S  |
| Parcel 16     | ST-31A      | Speedy-Dry absorbent  | 1990-1995                           | S  |
| Parcel 16     | ST-31B      | Thinner   | Prior to 1990                       | S  |
| Parcel 16     | ST-31B      | Speedy-Dry absorbent  | Prior to 1990                       | S  |
| Parcel 16     | ST-75A      | Aircraft cleaning compound  | 1992-1997                           | S  |
| Parcel 16     | ST-75A      | Path cleaner  | 1992-1997                           | S  |
| Parcel 23     | AMS-13      | <i>PR/VSI indicated no visible/reported releases identified, unit integrity good.</i> | 1952-1953                           | NA   |
| Parcel 23     | DI-01       | Possible metals   | 1947-1986                           | S,D  |
| Parcel 23     | MAW-01      | Well #9. Located off MCAS Tustin property.  |                                     |  |
| Parcel 27     | MAW-09      | Well #14. Not identified at this location during abandoned well investigation         | TBD                                 | NA   |
| Parcel 28     | STD-03A     | Freon   | 1991-1998                           | S  |
| Parcel 28     | STD-03B     | Freon   | prior to 1991                       | S  |
| Parcel 29     | AS-3A       | Munitions   | 1942-present                        | S  |

Attachment 3  
Hazardous Substances Notification Table

| Parcel Number | AOC    | Hazardous Substances*  | Date(s) of Storage and/or Operation | Stored (S), Released (R), or Disposed (D) of |
|---------------|--------|--|-------------------------------------|--|
| Parcel 29     | AS-3B  | Munitions  | 1942-present                        | S  |
| Parcel 29     | AS-3C  | Munitions  | 1942-present                        | S  |
| Parcel 29     | MAW-08 | <i>Destroyed well.</i>   | TBD                                 | NA   |
| Parcel 29     | OCY-01 | Agricultural chemicals   | 1983-present                        | S  |
| Parcel 29     | ST-81  | <i>Inactive. Temporary storage of hazmats. No current hazmat storage</i>   | 1942-1999                           | S  |
| Parcel 34     | MRR-01 | <i>Soil samples collected for metals content and none were detected. No visible evidence of release encountered during VSI</i> | 1940-1980                           | NA   |
| Parcel 35     | MCD-03 | <i>PR/VSI indicated no visible/reported releases identified, unit integrity good.</i>  | 1951-present                        | NA   |
| Parcel 40     | AD-03  | Possible metals  | 1963-1975                           | NA   |
| Parcel 40     | AS-6   | Possible metals  | 1953-1975                           | NA   |

Notes:

\* Hazardous Substances - Basewide Environmental Baseline Survey, Table F-1 (BNI 2001).

This table was prepared in accordance with 40 CFR 373 and 40 CFR 302.4.

The reported substances are not listed in 40 CFR 302.4, and therefore have no corresponding Chemical Abstracts Services (CAS) number, no regulatory synonyms, no Resource, Conservation and Recovery Act (RCRA) waste numbers, and no reportable quantities.

Acronyms/ Abbreviations:

AD - aerial photograph, possible disposal

AMS - aerial photograph, miscellaneous, stain, possible spill

AOC - area of concern

AS - aerial photograph, storage, possible temporary storage

BNI - Bechtel National, Inc.

CFR - Code of Federal Register

DI - disposal, incinerator

MAW - miscellaneous, abandoned well

MCAS - Marine Corps Air Station

MCD - miscellaneous, crash drill site

MRR - miscellaneous, rifle range

NA - not available

OCY - Osumi Corporation Yard

PR/VSI - preliminary review/visual site inspection

ST - storage, temporary

STD - storage, designated hazardous waste storage area

TBD - to be determined

TOW - treatment, oil/ water separator

Attachment 3  
Petroleum Products Notification Table

| Parcel Number | UST/AST or AOC | Petroleum Products*                          | Date(s) of Storage and/or Operation | Stored (S), Released (R), or Disposed (D) of |
|---------------|----------------|--|-------------------------------------|--|
| Parcel 1      | UST 5          | Fuel oil                                     | 1943 to prior to 1991               | S  |
| Parcel 1      | UST 7          | Fuel oil                                     | 1943 to prior to 1991               | S  |
| Parcel 1      | UST 9          | Fuel oil                                     | 1943 to prior to 1991               | S  |
| Parcel 1      | UST 132        | Fuel oil                                     | 1961 - 3/30/93                      | S  |
| Parcel 1      | UST 133        | Fuel oil                                     | 1961 - 12/12/97                     | S  |
| Parcel 1      | UST 134        | Fuel oil                                     | 1961 - 9/93                         | S  |
| Parcel 1      | UST 172A       | Diesel                                       | 1966 - 9/93                         | S  |
| Parcel 1      | UST 172B       | Gasoline                                     | 1966 - 9/93                         | S  |
| Parcel 1      | UST 177        | Fuel oil                                     | 1968 - 9/93                         | S  |
| Parcel 1      | UST 184        | Fuel oil                                     | 1969 - 9/93                         | S  |
| Parcel 1      | UST 213        | Fuel oil                                     | 1973 - 9/93                         | S  |
| Parcel 1      | UST 249        | Fuel oil                                     | 1984 - 9/93                         | S  |
| Parcel 1      | UST 526A       | Waste oil                                    | 1987 - 1/99                         | S  |
| Parcel 1      | UST 526B       | Waste oil                                    | 1987 - 3/99                         | S  |
| Parcel 1      | AST 227        | Diesel                                       | removed 8/12/97                     | S  |
| Parcel 1      | AST 526        | Diesel                                       | removed 4/26/99                     | S  |
| Parcel 1      | AMS-01         | Petroleum                                    | 1942 to present                     | S  |
| Parcel 1      | AMS-01         | Oil  | 1942 to present                     | S  |
| Parcel 1      | AMS-01         | Lubricant                                    | 1942 to present                     | S  |
| Parcel 1      | MFL-1A         | JP-5   | 1964-1997                           | S  |
| Parcel 1      | MMS-02 (A-F)   | Fuel   | 1988 to present                     | S  |
| Parcel 1      | MWA-3          | Oily water                                   | 1966 to 1995                        | S  |
| Parcel 1      | MWA-3          | Total Petroleum Hydrocarbons                 | 1966 to 1995                        | S  |
| Parcel 1      | ST-7           | JP-5   | 1991 to 1999                        | S  |
| Parcel 1      | ST-7           | Oil  | 1991 to 1999                        | S  |
| Parcel 1      | ST-7           | Oily rags                                    | 1991 to 1999                        | S  |
| Parcel 1      | ST-8           | Lubricant                                    | unknown to 1996                     | S  |
| Parcel 1      | ST-8           | Hydraulic fluids                             | unknown to 1996                     | S  |
| Parcel 1      | ST-10          | Waste JP-5                                   | 1991-1995                           | S  |
| Parcel 1      | ST-10          | Waste oil                                    | 1991-1995                           | S  |
| Parcel 1      | ST-10          | Oily rags                                    | 1991-1995                           | S  |
| Parcel 1      | TOW-03         | Waste oil                                    | 1988-1999                           | S,D  |
| Parcel 1      | TOW-03         | Waste fuel                                   | 1988-1999                           | S,D  |
| Parcel 1      | TOW-04         | Oily waste water                             | 1966-1993                           | S,D  |
| Parcel 16     | MMS-06         | JP-5   | 1997                                | S  |
| Parcel 16     | MMS-08         | JP-5   | 1997                                | S  |
| Parcel 16     | ST-31A         | Petroleum oil                                | 1990-1995                           | S  |
| Parcel 16     | ST-31A         | Hydraulic fluid                              | 1990-1995                           | S  |
| Parcel 16     | ST-31A         | Rags (with hydraulic fluid, freon, fuel oil) | 1990-1995                           | S  |
| Parcel 16     | ST-31B         | JP-5   | Prior to 1990                       | S  |
| Parcel 16     | ST-31B         | Petroleum oil                                | Prior to 1990                       | S  |
| Parcel 16     | ST-31B         | Hydraulic fluid                              | Prior to 1990                       | S  |
| Parcel 16     | ST-31B         | Rags (with hydraulic fluid, freon, fuel oil) | Prior to 1990                       | S  |
| Parcel 16     | ST-75A         | Gasoline                                     | 1992-1997                           | S  |
| Parcel 16     | ST-75B         | Fuel   | 1992-1997                           | S  |

Attachment 3  
Petroleum Products Notification Table

| Parcel Number | UST/AST or AOC | Petroleum Products*  | Date(s) of Storage and/or Operation | Stored (S), Released (R), or Disposed (D) of |
|---------------|----------------|----------------------|-------------------------------------|--|
| Parcel 23     | DI-01          | Fuels                | 1950's-1970's                       | R  |
| Parcel 23     | DI-01          | Oil                  | 1950's-1970's                       | R  |
| Parcel 27     | MMS-01         | Fuel                 | 1988                                | S  |
| Parcel 28     | AST 540A       | Moffett Trench waste | Unknown- 6/10/97                    | S  |
| Parcel 28     | AST 540B       | Moffett Trench waste | Unknown- 6/10/98                    | S  |
| Parcel 28     | STD-03A        | Waste oil            | 1991-1998                           | S  |
| Parcel 28     | STD-03A        | Oily rags            | 1991-1998                           | S  |
| Parcel 28     | STD-03A        | Hydraulic fluids     | 1991-1998                           | S  |
| Parcel 28     | STD-03B        | Oily rags            | prior to 1991                       | S  |
| Parcel 28     | STD-03B        | Waste oil            | prior to 1991                       | S  |
| Parcel 28     | STD-03B        | Hydraulic fluids     | prior to 1991                       | S  |
| Parcel 29     | UST 23C        | Gasoline             | 1977 - 1997                         | S  |
| Parcel 29     | AS-3A          | POL                  | 1942-present                        | S  |
| Parcel 29     | AS-3B          | POL                  | 1942-present                        | S  |
| Parcel 29     | AS-3C          | POL                  | 1942-present                        | S  |
| Parcel 29     | OCY-01         | Fuels                | 1983-present                        | S  |
| Parcel 29     | OCY-01         | Waste oil            | 1983-present                        | S  |

Notes:

\* Petroleum Products - Basewide Environmental Baseline Survey, Tables 5-5, 5-6, and F-1 (BNI 2001).

These UST/ASTs and AOCs contain petroleum products which fall within the scope of the CERCLA petroleum exclusion set forth in CERCLA Section 101(14).

Acronyms/Abbreviations:

AOC - area of concern

AMS - aerial photograph, miscellaneous, stain, possible spill

AS - aerial photograph, storage, possible temporary storage

AST - aboveground storage tank

BNI - Bechtel National, Inc.

CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act of 1980

DI - disposal, incinerator

MFL - miscellaneous fuel line

MMS - miscellaneous, major spill

MWA - miscellaneous, wash area

OCY - Osumi Corporation Yard

ST - storage, temporary

STD - storage, designated hazardous waste storage area

TOW - treatment, oil/water separator

UST - underground storage tank

**ATTACHMENT 4**  
**DOD POLICIES ON ASBESTOS, LEAD-BASED PAINT, AND RADON AT**  
**BASE REALIGNMENT AND CLOSURE PROPERTIES**

# **DoD Policies on Asbestos, Lead-Based Paint, and Radon at Base Realignment and Closure Properties (31 October 1994)**

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ACQUISITION AND  
TECHNOLOGY

OFFICE OF THE UNDER SECRETARY OF DEFENSE

3000 DEFENSE PENTAGON  
WASHINGTON DC 20301-3000



31 OCT 1994

MEMORANDUM FOR ASSISTANT SECRETARY OF THE ARMY  
(INSTALLATIONS, LOGISTICS & ENVIRONMENT)  
ASSISTANT SECRETARY OF THE NAVY  
(INSTALLATIONS & ENVIRONMENT)  
ASSISTANT SECRETARY OF THE AIR FORCE  
(MANPOWER, RESERVE AFFAIRS, INSTALLATIONS &  
ENVIRONMENT)  
DIRECTOR, DEFENSE LOGISTICS AGENCY

SUBJECT: Asbestos, Lead Paint and Radon Policies at BRAC Properties

The purpose of this memorandum is to request that you implement the attached Department of Defense (DoD) policies on asbestos, lead paint and radon at base realignment and closure (BRAC) properties.

As you may recall, these policies were drafted and accepted within the Defense Environmental Security Council (DESC) structure. During its May 6, 1994, meeting the DESC accepted the draft DoD policy on radon at BRAC properties. At that meeting, the draft policies on asbestos and lead paint were referred to the Environment, Safety and Occupational Health Policy Board (ESOHPB) for revision and acceptance. During its May 10, 1994, meeting the ESOHPB accepted the revised draft DoD policies on asbestos and lead paint at BRAC properties.

Subsequent to DESC and ESOHPB action, these policies were coordinated formally with the Assistant Secretary of Defense (Economic Security) and the Office of the Deputy General Counsel (Acquisition & Logistics). If there are any questions concerning this request, please contact Ed Dyckman, DESC Executive Secretary at 703-697-9107.

Gary D. Vest  
Principal Assistant Deputy Under Secretary  
of Defense (Environmental Security)

Attachments

Environmental Security



Defending Our Future

**DOD POLICY ON ASBESTOS  
AT BASE REALIGNMENT AND CLOSURE PROPERTIES**

Department of Defense (DoD) policy with regard to asbestos-containing material (ACM) is to manage ACM in a manner protective of human health and the environment, and to comply with all applicable Federal, State, and local laws and regulations governing ACM hazards. Therefore, unless it is determined by competent authority that the ACM in the property does pose a threat to human health at the time of transfer, all property containing ACM will be conveyed, leased, or otherwise disposed of as is through the Base Realignment and Closure (BRAC) process.

Prior to property disposal, all available information on the existence, extent, and condition of ACM shall be incorporated into the Environmental Baseline Survey (EBS) report or other appropriate document to be provided to the transferee. The survey report or document shall include:

- reasonably available information on the type, location, and condition of asbestos in any building or improvement on the property;
- any results of testing for asbestos;
- a description of any asbestos control measures taken for the property;
- any available information on costs or time necessary to remove all or any portion of the remaining ACM; however, special studies or tests to obtain this material are not required; and
- results of a site-specific update of the asbestos inventory performed to revalidate the condition of ACM.

Asbestos-containing material shall be remedied prior to property disposal only if it is of a type and condition that is not in compliance with applicable laws, regulations, and standards; or if it poses a threat to human health at the time of transfer of the property. This remediation should be accomplished by the active Service organization, by the Service disposal agent, or by the transferee under a negotiated requirement of the contract for sale or lease. The remediation discussed above will not be required when the buildings are scheduled for demolition by the transferee; the transfer document prohibits occupation of the buildings prior to the demolition; and the transferee assumes responsibility for the management of any ACM in accordance with applicable laws.

**DOD POLICY ON RADON  
AT BASE REALIGNMENT AND CLOSURE PROPERTIES**

In response to concerns with the potential health effects associated with radon exposure, and in accordance with the Indoor Radon Abatement provisions of Subchapter III of the Toxic Substances Control Act, 26 U.S.C. 2661 to 2671, the Department of Defense (DoD) conducted a study to determine radon levels in a representative sample of its buildings. In addition, as part of DoD's voluntary approach to reducing radon exposure, DoD has applied the Environmental Protection Agency (EPA) guidelines for residential structures with regard to remedial actions.

DoD policy is to ensure that any available and relevant radon assessment data pertaining to Base Realignment and Closure (BRAC) property being transferred shall be included in property transfer documents.

DoD policy is not to perform radon assessment and mitigation prior to transfer of BRAC property unless otherwise required by applicable law.

ACQUISITION AND  
TECHNOLOGY

## OFFICE OF THE UNDER SECRETARY OF DEFENSE

3000 DEFENSE PENTAGON  
WASHINGTON DC 20301-3000

JAN. 07 2000

MEMORANDUM FOR ASSISTANT SECRETARY OF THE ARMY  
(INSTALLATIONS, LOGISTICS, AND ENVIRONMENT)  
ASSISTANT SECRETARY OF THE NAVY  
(INSTALLATIONS AND ENVIRONMENT)  
ASSISTANT SECRETARY OF THE AIR FORCE  
(MANPOWER, RESERVE AFFAIRS, INSTALLATIONS  
AND ENVIRONMENT)  
DIRECTOR, DEFENSE LOGISTICS AGENCY

SUBJECT: Lead-Based Paint Policy for Disposal of Residential Real Property

The Department of Defense (DoD) policy is to manage lead-based paint in a manner protective of human health and the environment and to comply with all applicable Federal, State, or local laws regulating lead-based paint and lead-based paint hazards.

The attached Field Guide is a joint DoD and Environmental Protection Agency (EPA) guidance document for use by DoD and EPA personnel in the evaluation and control of lead-based paint at DoD residential real property scheduled for disposition under the base realignment and closure (BRAC) program. Lead-based paint requirements are defined by Title X, the Residential Lead-Based Paint Hazard Reduction Act of 1992, which amended the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. Section 4822) and its implementing regulations (under the EPA Toxic Substances Control Act (TSCA) Section 403 rule and the Department of Housing and Urban Development (HUD) Section 1013 rule). DoD will issue separate policy on lead-based paint requirements for transferring non-residential properties.

The Field Guide provides a general roadmap summarizing the requirements for the evaluation and control of lead-based paint hazards in target housing as defined by Title X and TSCA. In addition to existing Title X requirements, the Field Guide also specifies some actions that exceed Title X requirements. These actions represent DoD's desire to go beyond actions strictly required by law to ensure that activities taken in this regard are protective of human health and the environment. DoD policy is to:

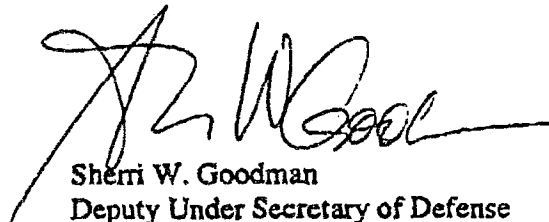
- Abate soil-lead surrounding housing constructed between 1960 and 1978 (Title X requires abatement of lead-based paint hazards in target housing constructed prior to 1960). The transfer agreement may require the purchaser to perform the abatement activities.
- Evaluate the need for interim controls, abatement, or no action for bare soil lead concentrations between 400 and 2000 ppm (excluding children's play areas) based on the findings of the lead-based paint inspection, risk assessment, and criteria contained in the Field Guide.



- Evaluate and abate lead-based paint hazards in structures reused as child-occupied facilities located on residential real property. Child-occupied facilities are day care centers, preschools, and kindergarten classrooms visited regularly by children under six years of age.
- Evaluate and abate soil-lead hazards for target housing demolished and redeveloped for residential use following transfer. Under Title X, residential dwellings that are demolished or not intended for occupancy after transfer do not require an inspection and risk assessment or lead-based paint control and hazard abatement. However, DoD requires that the terms of property transfer include a requirement for the transferee to evaluate and abate any soil-lead hazards prior to occupancy of any newly constructed dwelling units.

By adding these additional measures as a matter of policy, DoD believes it exceeds measures necessary to reduce potential lead exposures in children and will significantly contribute to the elimination of adverse effects in children from exposures to lead from lead-based paint in federally-owned target housing subject to disposition.

This lead-based paint policy supersedes the DoD 31 October 1994 lead-based paint policy attached to the PADUSD (ES) memorandum, Asbestos, Lead Paint, and Radon Policies at BRAC Properties. The asbestos and radon policies referenced in the memorandum remain in effect. Property transfer agreements executed under the previous policy are not required to meet these requirements. The effective date implementing these requirements is 30 March 2000.



Sherri W. Goodman  
Deputy Under Secretary of Defense  
(Environmental Security)

Attachment

**ATTACHMENT 5**  
**COMMENTS/RESPONSES TO COMMENTS**



## Department of Toxic Substances Control



Edwin F. Lowry, Director  
5796 Corporate Avenue  
Cypress, California 90630

Gray Davis  
Governor

Winston H. Hickox  
Agency Secretary  
California Environmental  
Protection Agency

April 22, 2002

Mr. Keith S. Forman  
BRAC Environmental Coordinator  
Naval Facilities Engineering Command  
BRAC Program Office  
1230 Columbia Street, Suite 1100  
San Diego, California 92101-8517

FINDING OF SUITABILITY TO TRANSFER (FOST) FOR PARCELS 23, 29, 34, 35,  
AND 36, AND PORTIONS OF 1, 16, 17, 24, 27, 28, 40 AND 41, MARINE CORPS AIR  
STATION (MCAS) TUSTIN, TUSTIN, CALIFORNIA

Dear Mr. Forman:

On April 18, 2002, the Department of Toxic Substances Control (DTSC) received electronic versions of the revised text, tables and response to comments for the subject document, also known as FOST 3. The revised text is postdated April 25, 2002. Based upon review of the revised text, tables and response to comments, DTSC comments forwarded on April 10 through 12, 2002 have been adequately addressed.

The purpose of this FOST is to document the conclusion that the property identified above is suitable for transfer by deed. Areas within the property specified that are subject to ongoing environmental investigations or response actions that are not suitable for transfer by deed have been carved out. These carve-out (CO) areas are included in the *Finding of Suitability to Lease for Carve-Out Areas 5, 6, 7, 8, 9, 10, and 11, Marine Corps Air Station Tustin, Tustin, California* (FOSL 3) that is currently under review.

DTSC is unable to concur with the suitability of Parcels 1 and 17 for transfer. The 1998 MCAS Tustin Specific Plan/Reuse Plan Errata identifies Parcels 1 and 17 as educational/recreational use. As a result, it is possible that the reuse of these parcels could include school sites, meaning kindergarten through grade 12 (elementary, middle and high schools). Additional detail is not provided for Parcel 1 and the Base

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at [www.dtsc.ca.gov](http://www.dtsc.ca.gov).*

Mr. Keith S. Forman  
April 22, 2002  
Page 2

Realignment and Closure (BRAC) Business Plan 2002 (in review) designates the land use of Parcel 17 as a High School. Pursuant to the California Education Code, section 17210 et seq., a separate and comprehensive environmental review is required for sites where state funds will be used for property acquisition or school construction. This law requires that DTSC make a determination as to the suitability of the property for school use based on this review. The review process includes an evaluation of whether hazardous materials on the property have been or could be released that would endanger students. Because this separate environmental review has not been conducted for Parcels 1 and 17, DTSC cannot determine if these parcels are suitable for the intended use.

DTSC is unable to concur with the suitability of Parcels 23, 29, 34, 35, and portions of Parcels 1, 16, 27, 28, and 40 for transfer. These parcels include buildings/structures where potential releases of lead from lead-based paint (LBP) were not evaluated or where sufficient information was not provided for DTSC to determine if LBP is a potential issue. DTSC considers the presence of exterior LBP that has been released to the soil to pose a potential release to the environment pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986.

The Department of the Navy (DON) is required to evaluate and address all releases of CERCLA hazardous substances at its facilities, and where property has been transferred under CERCLA 120(h)(3), the DON must covenant that it will perform any remedial action found to be necessary after the date of transfer. In addition, the "DoD [Department of Defense] Policy on Responsibility for Additional Environmental Cleanup after Transfer of Real Property" (DoD Come-back Policy) asserts that DoD will typically utilize the Local Redevelopment Authority's reuse plan as the basis for the land use assumptions that DoD will consider during a remedy selection process. Based upon the date of construction of various buildings/structures on these parcels, a potential release to the environment of lead associated with exterior LBP exists. As a result, the DON should verify if LBP is present on the exterior of these buildings/structures and should conduct soil sampling to determine whether soils surrounding these buildings/structures contain lead from LBP which may pose a threat to human health or the environment.

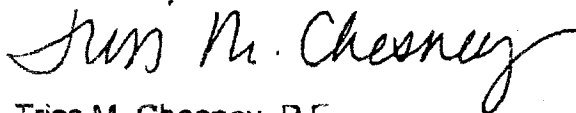
DTSC understands that the DON looks to Title X, the Residential Lead-Based Paint Hazard Reduction Act and the joint DoD/United States Environmental Protection Agency (EPA) interim final "Lead-Based Paint Guidelines for Disposal of Department of Defense Residential Real Property - A Field Guide," dated December 1999, to address the hazards posed by LBP. DTSC, however, has not adopted the joint DoD/EPA guidelines and its criteria for evaluating LBP hazards. DTSC maintains that lead from LBP is a CERCLA release. Therefore, without site-specific data, DTSC is unable to

Mr. Keith S. Forman  
April 22, 2002  
Page 3

determine whether, pursuant to CERCLA 120 (h)(3), all remedial actions to protect public health have been taken at Parcels 23, 29, 34, 35, and portions of Parcels 1, 16, 27, 28, and 40 with respect to potential releases of lead from LBP. In addition, DTSC cannot concur categorically that DON has no future CERCLA liability to evaluate or remediate LBP releases into the soil should such contamination be found.

Please ensure that the revised text, tables, response to comments and all attachments are incorporated into the final version of the document. Thank you for providing DTSC with the opportunity to review this FOST. If you have any questions regarding this letter, please contact Ms. Jennifer Rich, Remedial Project Manager, at (714) 484-5415 or me at (714) 484-5395.

Sincerely,



Triss M. Chesney, P.E.  
Acting Unit Chief  
Base Closure/Reuse Unit  
Office of Military Facilities

cc: Mr. James Ricks  
Project Manager  
U.S. Environmental Protection Agency  
(SFD-H-8)  
Region IX  
75 Hawthorne Street  
San Francisco, California 94105

Ms. Patricia Hannon  
Project Manager  
Regional Water Quality Control Board  
3737 Main Street, Suite 500  
Riverside, California 92501-3339

Mr. Dana Ogdon  
Senior Planner  
City of Tustin  
300 Centennial Way  
Tustin, California 92780

Mr. Keith S. Forman

April 22, 2002

Page 4

cc: Ms. Mary Lynn Norby, Co-Chairperson  
Restoration Advisory Board  
14512 Emerywood Road  
Tustin, California 92780

Mr. Jerry Dunaway  
BRAC Environmental Coordinator  
Naval Facilities Engineering Command  
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1230 Columbia Street, Suite 1100  
San Diego, California 92101-8517

Ms. Melanie Kito  
Remedial Project Manager  
Naval Facilities Engineering Command  
BRAC Program Office  
1230 Columbia Street, Suite 1100  
San Diego, California 92101-8517

**Response Comments**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

*15 April 2002 Comments to Draft Final FOST from: Ms. Triss Chesney, Acting Unit Chief, City of Tustin*

|    | COMMENTS   | RESPONSES  |
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| 1. | <p>Section 2.7 - Parcel 28 (Portions)</p> <p>The revised text does not comply with the requirements of the OU-3 ROD. However, at a minimum, the sentence beginning with "Land use restrictions ..." should be rewritten as, "Land use restrictions and access pertaining to these groundwater monitoring wells are covered in a Covenant to Restrict Use of Property and the Deed transferring Parcel 28 per the Record of Decision (ROD) for Operable Unit (OU)-3."</p>   | The FOST was revised to incorporate this comment.  |
| 2. | <p>Section 8.2 - Notification - Polychlorinated Biphenyls</p> <p>The Navy is utilizing criteria included in the Toxic Substances Control Act to determine if PCB items and equipment should be processed/discharged of as regulated items. Notification should be provided that items or equipment that contain any amount of PCBs could result in a release of hazardous substances if they are not handled properly during demolition activities. Any release of hazardous substances would need to be addressed in accordance with the California Health and Safety Code, the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986, and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP)..</p> | In addition to the federal standards for PCBs, Cal-EPA has a 5 ppm or greater hazardous waste characterization standard for PCBs. However, this is only applicable for disposal purposes once PCBs are removed from service. It does not apply to PCBs still in service. The following sentence is included in Section 8.2: "PCB-containing equipment may also be subject to State hazardous waste laws regulating PCB waste." |

*10-12 April 2002 Comments to Draft Final FOST from: Ms. Triss Chesney, Acting Unit Chief, City of Tustin*

|    | COMMENTS   | RESPONSES   |
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| 1. | <p>Acronyms/Abbreviations, Page v</p> <p>Please remove the acronym "CEC" and spell it out when it is used in the text.</p>   | The FOST was revised to incorporate this comment. |
| 2. | <p>Section 3.0 - Regulatory Coordination, Page 10</p> <p>The last paragraph of this section states, "The BRAC Cleanup Plan Guidebook . . . in order to classify them into one of the other area types." Please delete this paragraph since it was added to Section 5.0 - Environmental Baseline Survey History and Findings.</p> | The FOST was revised to incorporate this comment. |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|    | COMMENTS  | RESPONSES  |
|----|---|--|
| 3. | <p><b>8.1 - Notification - Pesticides</b></p> <p>Page 16, Second Paragraph: This paragraph states, "In 1992, a preliminary endangerment assessment (PEA) was conducted for Parcel 24 (referred to in the PEA as Parcel A)." Then, in Attachment 2, the May 27, 1992 letter from DTSC provides approval of a PEA conducted for Parcel D, New Family Housing Project. Please clarify the discrepancy.</p> <p>Based on the information provided from the 1992 Preliminary Endangerment Assessment and the 1996 Pesticide Investigation Report, Parcel 16 is not addressed in either document. Additionally, the Notification/Restriction for pesticides at Parcel 16 states, "The 1992 PEA sampling and risk assessment and the 1996 pesticide investigation indicated that the property was suitable for unrestricted, residential use." Please explain the determination that Parcel 16 is suitable for unrestricted, residential use.</p> <p>DTSC Comment 22 included a request to provide a copy of the regulatory concurrence for the 1996 pesticide investigation report in Attachment 2. The DON responded that investigation reports are not required to have regulatory concurrence because they are used as supporting information for future decision documents. For clarification, Paragraph 10.3 of the Federal Facility Site Remediation Agreement (FFSRA) for Marine Corps Air Facility Tustin states, "The Navy shall complete and transmit drafts of the following documents (or the CERCLA equivalents) for each SWMU [Solid Waste Management Unit] (or CERCLA OU [Operable Unit]) and for the final remedy to DTSC for its review, comment and approval in accordance with this section." The associated list includes investigation reports under RFI [Resource Conservation or Recovery Act Facility Investigation] Reports. As a result, investigation reports are required by the FFSRA to have DTSC approval and a copy of the approval/concurrence letter should be provided in Attachment 2.</p> | <p>The referenced paragraph was revised to include the following sentences:</p> <p>"In 1991 and 1992, a preliminary endangerment assessment (PEA) was conducted for Parcel 24 (PEA Parcel A), Parcels 38 and 39 (PEA Parcel C), and Parcel 33 (PEA Parcel D). DTSC provided NFA concurrence on the findings in the PEA for the areas containing Parcels 24, 33, 38, and 39. DTSC's 26 May 1992 NFA concurrence letter for Parcel A and 27 May 1992 NFA concurrence letters for Parcels C and D are provided in Attachment 2."</p> <p>Parcel 16 was removed from the Pesticide Notification. Appropriate Responses to Comments were also revised per this change. Parcel 16 is not considered an agricultural area and pesticides were not used on this parcel (see 1996 Pesticide Investigation Report).</p> <p>The following sentence is included in Section 8.1, paragraph 6, and the referenced letter is included in Attachment 2:</p> <p>"The 1996 Pesticides Investigation Report was reviewed by the BCT whose comments were incorporated (see 15 July 1996 letter in Attachment 2)."</p> |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|    | COMMENTS  | RESPONSES   |
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| 4. | <p>Section 8.2 - Notification - Polychlorinated Biphenyls (PCBs)</p> <p>Since sampling of the small capacitor at Building 218 was not conducted, please explain how the DON determined that the small capacitor does not have a PCB concentration of 50 parts per million (ppm) or more.</p> <p>Please reference the applicable citation, 40 Code of Federal Regulations part 761.3.</p> <p>In Table 6, the maximum PCB content is specified as 0 ppm, a PCB Equipment Inspection was performed, and no corrective action is required. Please revise the table to reflect that observation and/or sampling was not conducted for the small capacitor at Building 218 and that the PCB content is unknown.</p> | <p>The FOST makes no determinations regarding the PCB concentration of the small capacitor. The responses to DTSC March 2002 comments #23 and #41 were revised to remove these determinations.</p> <p>The PCB concentration of small capacitors is not relevant to this FOST. 40 CFR 761.20 considers intact non-leaking PCB capacitors as "totally enclosed" containers. Further, per 40 CFR 761.20(c)(1), PCBs at concentrations of 50 ppm or greater, may be distributed (i.e., transferred) in a "totally enclosed manner". If the transferee plans to dispose equipment containing more than 3 pounds of PCB fluids, they should be processed as regulated items.</p> <p>The following sentence is included in the referenced section:<br/> "Transformers with PCB concentrations of less than 50 ppm are classified by federal standards (40 Code of Federal Regulations 761.3) as non-PCB transformers."</p> <p>The maximum PCB content listed in Table 6 is for the building's/structure's associated transformer(s), not for the other PCB equipment found at the building/structure (e.g., small capacitor). Table 6 was revised to provide clearer column headings to indicate this.</p> |
| 5. | <p>Section 8.7.2.2 - Nonresidential Buildings/Structures</p> <p>First Paragraph: In the last sentence, please delete, "prior to occupation of any newly constructed buildings."</p> <p>Second Paragraph: On Page 29 and in Table 1, Building 162 is scheduled for demolition. Please move Building 162 from the second paragraph in this section that discusses buildings to be reused to the first paragraph that includes buildings scheduled for demolition.</p>   | <p>The text was revised to incorporate this comment.</p> <p>The text was revised to incorporate this comment.</p>   |
| 6. | <p>Section 8.9 - Notification - School Site Considerations</p> <p>In the second sentence, delete "(CEC)" and replace additional occurrences of the acronym with "California Education Code."</p>  | <p>The text was revised to incorporate this comment.</p>  |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|    | COMMENTS  | RESPONSES   |
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| 7. | <p>Table 2 - Areas of Concern</p> <p>Page 2 of 13, MMS-02D, E and F: Please clarify that the no further action (NFA) concurrence is for MMS-02 that is comprised of MMS-02A, B, C, D, E and F.</p> <p>Additionally, MMS-02A, B and C are currently included in CO-11. If CO-11 is moved based on comments provided on FOSL 3, ensure that the changes are reflected in FOST 3.</p> <p>Page 5 of 13, ST-68C: Currently, ST-68C is included in FOST 3 and ST-68A and ST-68B are included in FOSL 3. Please clarify the location of ST-68D, E and F and update Table 2 and the figures in the appropriate document.</p> <p>Additionally, ST-68A and ST-68B are currently included in CO-11. If CO-11 is moved based on comments provided on FOSL 3, ensure that the changes are reflected in FOST 3.</p> | <p>Table 2, rows MMS-02D, E, and F were revised to include the following:<br/> "NFA concurrence for MMS-02 (comprised of MMS-02A-F)"</p> <p>FOST 3 and FOSL 3 are consistent.</p> <p>FOST 3 (Table 2 and Figure 7) includes ST-68C (Parcel 1). FOSL 3 (Table 4 and Figure 4) includes ST-68A and B (CO-11, Parcel 1). FOST 2 (Table 2 and Figure 6) includes ST-68D, E, and F (Parcel 8). Table 2, row ST-68C was revised to include the following:<br/> "NFA concurrence for ST-68 (comprised of ST-68A-C)"</p> <p>FOST 3 and FOSL 3 are consistent.</p> |
| 8. | <p>Table 3 - Former UST/AST Sites</p> <p>Page 3 of 3, Notes: Please remove Parcel 28 from Note "a" since Parcel 28 has two associated ASTs.</p>   | <p>Table 3 was revised to incorporate this comment.</p>   |
| 9. | <p>Table 5 - Environmental Factors Considered</p> <p>Please change the designation for monitoring wells from "No" to "Yes."</p> <p>Please add "School site considerations" as an environmental factor considered and designate as "Yes."</p>  | <p>Table 5 was revised to incorporate these comments.</p>   |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|     | COMMENTS  | RESPONSES  |
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| 10. | <p>Table 9 - Notifications and Restrictions Summary</p> <p>Page 13 of 14, Parcel 40, LBP: The Notification/Restriction states, "Buildings 516 and 3002T (built after 1978) may be transferred without restrictions for occupancy due to LBP." However, according to Section 8.7.1 - Notifications - Lead-Based Paint, Building 3002T is guard house with an unknown construction date that is scheduled for demolition. Please revise the Notification/Restriction for Building 3002T.</p> <p>Page 13 of 14, Parcel 41, ACM: Building 6873 and Structure 6874 should be removed from the Notification/Restriction for Parcel 41. On Figure 6, Building 6873 and Structure 6874 are shown on Parcel 35.</p> <p>Parcels 27, 28, 29 and 40: There are no residential buildings in these parcels. However, the Notification/Restriction for Radon states, "Radon testing was conducted in 1991 at a representative number of residential buildings." Please clarify the applicability of the Radon Notification/Restriction for these parcels.</p> <p>Parcel 34: Please add a Notification/Restriction for PCBs since, according to Table 6, it is unknown if a transformer is associated with the Irvine Park North Housing.</p> <p>Parcel 36: Please add a Notification/Restriction for PCBs since, according to Table 6, it is unknown if a transformer is associated with the Irvine Park South Housing.</p> <p>Parcels 24, 28, 34, 35, 40, and 41: Include notifications for unexploded ordnance consistent with Section 8.8 - Notification - Unexploded Ordnance.</p> | <p>The referenced notification (LBP at Parcel 40) was revised and is included in Table 9 as follows:</p> <p>"Copies of the LBP survey reports for buildings/structures in this parcel will be included in the transfer documentation. Buildings restricted based on LBP hazards may be occupied on an interim basis if the transferee conducts the necessary LBP surveys and abatement according to all local, state, and federal requirements.</p> <p>Buildings 162, 182, and 3002T (scheduled for demolition and built prior to 1978 or with unknown construction date) are restricted from residential use and children will not be allowed to occupy this building. The transferee will be required to demolish the building in accordance with applicable laws and conduct post-demolition sampling and abatement of soil-lead hazards prior to occupation.</p> <p>Structure 6480 (disposition "to be determined" with an unknown construction date) may be transferred without restrictions for occupancy due to LBP because this structure does not have painted surfaces (or limited amounts).</p> <p>Building 516 (built after 1978) may be transferred without restrictions for occupancy due to LBP."</p> <p>Notifications/restrictions for ACM and LBP for Building 6873 and Structure 6874 were removed the applicable Parcel 41 notifications/restrictions. Notifications/restrictions for Building 6873 and Structure 6874 are listed in Parcel 35.</p> <p>Table 9 was revised to only include radon notifications for Parcels 23, 34, 35, and 36. The text was also revised to clarify this issue as follows:</p> <p>"Radon screening results were based upon a representative sampling of residential buildings in Parcels 23, 34, 35, and 36. The results of the radon survey indicated that none of the residential buildings contained levels of radon above 4 picocuries per liter (pCi/L)."</p> <p>Table 6 was revised to show that Irvine Park North Housing, Irvine Park South Housing, Tustin Villas Housing, and Moffett Meadows, do not have associated transformers. The 1996 PCB transformer survey (see EBS pages 5-42 and 5-43) was basewide (which includes the housing areas) and did not identify transformers in the housing areas (see EBS Table 5-11). Therefore, no revisions were made to Table 9 regarding this comment.</p> <p>Notifications for Unexploded Ordnance were added for Parcels 24, 28, 34, 35, 40, and 41 stating that according to the IRP-2 Remedial Investigation, no further action is necessary for these parcels due to unexploded ordnance.</p> |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|     | COMMENTS   | RESPONSES  |
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| 11. | <p>Attachment 2 - No Further Action Regulatory Concurrence Letters</p> <p>September 2000: Please include the entire Declaration for the Record of Decision for Operable Unit 2 so that it is clear which sites are addressed.</p> <p>Include the signature page from the RWQCB NFA concurrence letter dated May 15, 2002.</p> <p>Include the signature page from the RWQCB NFA concurrence letter dated March 22, 1999.</p> <p>Please explain why the RWQCB NFA concurrence letter dated November 26, 1997 is attached.</p>  | <p>The Declaration for the OU-2 ROD is included in Attachment 2.</p> <p>There is no NFA concurrence letter dated May 15, 2002. For the NFA concurrence letter dated May 15, 2000, the signature page was included. The first page of the May 15, 2000 letter was accidentally included twice - this was remedied.</p> <p>The referenced signature page is included in Attachment 2.</p> <p>The referenced letter was removed from Attachment 2.</p>  |
| 12. | <p>Section 8.0 - Use Restrictions and Notifications</p> <p>Please add a section for notification and restrictions for monitoring wells and surface water gauging locations. The notifications and restrictions should apply to Parcels 1, 27, 28, 29/40 (it is difficult to determine if BMW06S is located on Parcel 29 or 40), and 41. The restrictions should be similar to those identified for the monitoring wells in the OU-3 Record of Decision (page 7-13), "Monitoring wells and surface water gauging locations and associated equipment shall not be altered, disturbed, or removed without the prior review and written approval of the DON, DTSC, RWQCB, and other regulatory agencies that have jurisdiction over the activity."</p> <p>Then, Table 5 should be updated to show that there are environmental factors that may pose restrictions or require notification for monitoring wells/surface water gauging stations.</p> <p>Likewise, in Table 9, restrictions and notifications for monitoring wells/surface water gauging stations should be added for each parcel that has a well or station.</p> <p>The monitoring wells/surface water gauging stations should be mentioned in the description of applicable parcels in Section 2.0.</p> | <p>Table 8 was revised to indicate that BMW06S is partially located on both Parcels 29 and 40.</p> <p>The following paragraph was included as Section 8.10, Monitoring Well:</p> <p>"Parcels 1, 27, 28, 29, 40, and 41 contain groundwater monitoring wells and surface water gauging locations that are periodically monitored (see Table 8). These monitoring wells, surface water gauging locations, and their associated equipment shall not be altered, disturbed, or removed without the prior review and written approval of DON and the BCT."</p> <p>Table 5 was revised to indicate that "Monitoring Wells/Surface Water Gauging Locations" were an Environmental Factor that was considered for this FOST.</p> <p>The notifications/restrictions for monitoring wells/surface water gauging locations in Table 9 were expanded to include language similar to the following for Parcels 1, 27, 28, 29, 40, and 41:</p> <p>"Access to monitoring well BMW06S will be required after property transfer. This monitoring well and its associated equipment shall not be altered, disturbed, or removed without the prior review and written approval of DON and the BCT."</p> <p>Sections 2.1, 2.6, 2.7, 2.8, 2.12, and 2.13 were revised to indicate the number of monitoring wells and/or surface water gauging locations located on the respective parcel.</p> |
| 13. | <p>Section 8.6.2 - Restrictions - Asbestos-Containing Material</p> <p>DTSC would like to clarify the restrictions for buildings/structures designated as "to be determined" (TBD) with respect to reuse. Please clarify that occupancy of TBD buildings/structures will be restricted if an ACM survey has not been completed.</p>   | <p>Section 8.6.2.1, Restrictions-ACM, Buildings/Structures Planned for Demolition or TBD includes the following sentence for all buildings/structures subject to occupancy restrictions in this section:</p> <p>"This building may only be occupied if the transferee conducts the necessary ACM surveys and abatement according to all local, state, and federal requirements prior to occupancy or renovation."</p>  |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
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| 14. | In the response to DTSC comments, for several parcels, the Navy states, "The Reuse Plan does not designate this Parcel for schools or day care facilities." Parcels designated for "commercial/business" could include day care centers unless the City of Tustin has an ordinance prohibiting or restricting such a use. DTSC is concerned that many day care centers are located in commercial/business/industrial areas. Has the Navy considered this issue?   | DON has considered the possibility that the property may be used in ways other than those designated in the Reuse Plan. To ensure protection of human health and the environment, DON has written restrictions and notifications into the FOST based on any potential use. For example, though Building 182 is slated for demolition and commercial/business reuse, it is still restricted from residential use and children will not be allowed to enter the building due to LBP. Therefore, if it is later designated for reuse as a child-occupied facility, the FOST, not the Reuse Plan, will dictate what restrictions are applicable.  |
| 15. | <p>Pesticides</p> <p>In FOST 2 (September 28, 2001), Page 15 states, "Pesticide concentrations were compared with those reported in soil collected from Parcels 38 and 39 during a previous pesticides investigation (GeoRemediation 1992b)." This implies that the pesticide investigation for Parcels 38 and 39 were part of the 1992 preliminary endangerment assessment (PEA) that received DTSC concurrence. However, in FOST 3, Page 16 states, "In 1996, soil samples were collected from the southwest corner (parcel 6), southern corner (Parcels 38 and 39), and the northeast quadrant (Parcels 17, 25, 26, 27, 28, 29, 30, 31, 33, and 40) of MCAS Tustin to evaluate whether residual pesticides and metals were present in soil as a result of past agricultural activities at MCAS Tustin (BNI 1996b)." This implies that the pesticide investigation for Parcels 38 and 39 were part of the 1996 pesticide investigation study. Please clarify the discrepancy between FOST 2 and 3.</p> <p>Additionally, the screening risk assessment in the 1996 pesticide investigation indicated that metals and pesticides pose no significant risk to human health or the environment. DTSC is concerned that the results of the 1996 pesticide investigation are being used to determine that the property suitable for unrestricted, residential use; however, a concurrence letter from DTSC is not available. Does the Navy have some documentation to show that DTSC reviewed the report or response to comments?</p> | <p>Section 8.1 was revised to clarify which parcels were included in each study. Parcels 38 and 39 were studied in the 1992 PEA. The FOST includes the following text:</p> <p>"In 1991 and 1992, a preliminary endangerment assessment (PEA) was conducted for Parcel 24 (PEA Parcel A), Parcels 38 and 39 (PEA Parcel C), and Parcel 33 (PEA Parcel D). Further investigation in 1996 supported the PEA findings. Soil samples were collected from the southwest corner (Parcel 6) and the northeast quadrant (Parcels 17, 25, 26, 27, 28, 29, 30, 31, 32, and 40) of MCAS Tustin to evaluate whether residual pesticides and metals were present in soil as a result of past agricultural activities at MCAS Tustin (BNI 1996b)."</p> <p>The following sentence is included in Section 8.1, paragraph 6, and the referenced letter is included in Attachment 2:</p> <p>"The 1996 Pesticides Investigation Report was reviewed by the BCT whose comments were incorporated (see 15 July 1996 letter in Attachment 2)."</p> |
| 16. | <p>According to the Section 7.2.5.2 - Implementation of Institutional Controls in the Final Record of Decision for Operable Unit 3, "The boundaries, conditions, land-use restrictions, and terms will be described in the Finding of Suitability to Transfer (FOST), the Covenant, and the Deed. The description of the boundaries, conditions, land-use restrictions, and terms will be stated in each of those documents as stated herein." As a result, the information required by the ROD needs to be included in Section 2.7 - Parcel 28 (Portions) and Section 8.0 in a section that addresses notifications and restrictions for groundwater monitoring wells.</p> <p>On Page 7-13 of the Final Record of Decision for Operable Unit 3, there are also "Additional Specific Requirements" that need to be included in the FOST, Covenant and Deed. Please include the requirements identified in the ROD.</p>  | <p>The following sentence was added to Section 2.8:</p> <p>"Land use restrictions and access pertaining to these groundwater monitoring wells are covered in a Covenant to Restrict Use of Property and the Deed transferring Parcel 28 per the Record of Decision (ROD) for Operable Unit (OU)-3."</p> <p>All land use restrictions listed in Section 7.2.5.3 of the OU-3 ROD are also listed in the FOST for the property included within the boundaries of CO-10 (i.e., OU-3).</p> <p>Terms of the deed and lease will be negotiated during the drafting of the deed(s) and lease(s).</p>  |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

20-29 March 2002 Comments to Draft FOST from: Ms. Jennifer Rich, Remedial Project Manager, DTSC

|    | GENERAL COMMENTS  | RESPONSES   |
|----|---|---|
| 1. | Sites ST-16A and ST-16B are listed as Area Type 5. Sites categorized as Area Type 5 cannot be transferred. Please revise the FOST accordingly.  | The CO areas were revised. Sites ST-16A and ST-16B were removed from the FOST and are included in CO-7.   |
| 2. | Sites UST-135, AST-194A and AST-194B have not received regulatory concurrence for no further action and should not be transferred. Please revise the FOST accordingly.  | The CO areas were revised. Site UST-135 was removed from the FOST and is included in CO-5. The areas affected by sites AST-194A and AST-194B were removed from the FOST and are included in CO-11.  |
| 3. | Mooring Pads 4 and 5 are under investigation and considered an Area Type 7. Sites categorized as Area Type 7 cannot be transferred. Please revise the FOST accordingly.   | The CO areas were revised. Mooring Pads 4 and 5 were removed from the FOST and are included in CO-8.  |
| 4. | OCY-01 received regulatory concurrence for NFA on February 21, 2002. Please update the FOST to reflect this NFA concurrence, including placing the NFA concurrence letter in Attachment 2.  | The FOST was revised to reflect the NFA concurrence of OCY-01.  |
| 5. | The FOST states that there are four Area Type 2 underground storage tanks (USTs) and two Area Type 2 aboveground storage tanks (ASTs), which received no further action (NFA) concurrence from the Regional Water Quality Control Board (RWQCB), located on transfer Parcels 1, 28, and 29. Because the RWQCB uses other than risk based clean up standards to make its NFA determinations for UST/AST sites, Sections 2.1, 2.7 and 2.8 should be supplemented with a discussion on past response actions and cleanup standards used for each of the USTs/ASTs. | <p>The RWQCB does not require risk-based standards for UST and AST site closures. All site investigations and remedial actions have been completed for the sites that the RWQCB has concurred with the recommendations for closure per the California Code of Regulations. Therefore, no additional discussion is necessary.</p> <p>The Navy understands this is an "Unresolved Comment" and it will be attached to this FOST per the BRIM guidelines.</p>  |
| 6. | Attachment 2 is supposed to contain all the NFA concurrence letters for USTs, ASTs, AOCs, and PEAs associated with the transfer parcels. Many of the concurrence letters are missing. The large majority are those letters issued by the RWQCB. Please ensure that all the appropriate NFA concurrence letters are included in Attachment 2.  | All the appropriate NFA concurrence letters are included in Attachment 2.   |
| 7. | The Final Basewide Environmental Baseline Survey (EBS)(March 2001) provides a discussion on ordnance. It mentions that there was previously one pistol/rifle range and three skeet ranges located on MCAS Tustin property, but does not specify which parcels. Were any of these previous ranges located on any of the parcels related to this FOST?  | <p>Section 8.8 Notification - Unexploded Ordnance was added to the FOST as follows:</p> <p>"Former range areas within the transfer boundaries include: one pistol/rifle range located in Parcel 34 (with a safety fan in 28, 40, 41) and three skeet ranges located in Parcels 24, 34 and 35. Based on the historical uses of the ranges, potential ordnance or explosive hazards were limited to small caliber debris.</p> <p>In 1979 the pistol/rifle range located at Parcel 34 was deactivated and disposed of by demolition. The area was cleared and grubbed during base housing construction in 1979 and 1982; approximately 2-3 feet of native topsoil was removed and replaced with clean fill material. The former pistol/rifle range was investigated as part of IRP-2 and the RI recommended NFA for the site. All environmental investigations conducted at MCAS Tustin have suggested that ordnance and/or explosive hazards do not remain on the property (BNI 2001)."</p> |

**Response to Comments (continued)**  
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|     | GENERAL COMMENTS  | RESPONSES   |
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| 8.  | In DTSC's comments to the Navy regarding FOST 3 (letter dated March 27, 2002), DTSC requested justification that boundaries and buffer zones for the CO Areas are adequate. The extent of the CO Areas directly impacts FOST 3. Therefore, the Navy must ensure that any changes to the CO Areas, as a result of comments made on FOST 3, need to be reflected in the draft final version of FOST 3. For example, the boundary for IRP-1 (CO-9 in FOST 3 and CO-10 in FOSTL 3) needs to be consistent with the Record of Decision for OU-3.                             | The CO areas of the draft final FOST 3 are consistent with draft FOSTL 3.<br><br>Specifically, CO-10 encompasses the site boundary stated in the OU-3 ROD, which ensures protection of human health and the environment. The entire channel (Parcel 41) was included in the CO to avoid splitting a parcel since the containment wall is shown to end at the Peters Canyon Channel bottom in the OU-3 ROD. Also, the mingled plume institutional control buffer zone will be consistent between the FOST3, FOSTL3, and the draft final OU-4 FS.   |
| 9.  | The Ultimate Parcel Use (Table 1) and any descriptions in the FOST need to be consistent with the approved Reuse Plan. Any inconsistencies or differences need to be explained.   | The FOST was revised to include the following as fourth paragraph of Section 1.0:<br>"Ultimate parcel uses in the FOST are designated as one of four categories: Educational/Recreational, Commercial/Business, Residential, or Circulation Facilities. These categories incorporate the more specific parcel uses as designated in the Reuse Plan for Tustin."   |
| 10. | Please be sure there is consistency between FOST #3 and FOSTL #3.   | FOST 3 and FOSTL 3 were revised concurrently and are consistent.  |
| 11. | On Figures 2 through 7 and 9, please change "Valinca Ave." to "Valencia Ave." and "Von Karmen Ave." to "Von Karman Ave."  | The FOST figures were revised to incorporate this comment.  |
| 12. | In Parcel 1 there is at least one building (Building 134) and perhaps more (see Figure 3), that show a portion of a building(s) being transferred and another portion(s) being carved-out. Doesn't this pose a problem for the transfer? Please explain.  | The CO area lines have not been surveyed and therefore, are only approximated for the FOST figures. Buildings that lie within the CO areas or lie partially within the CO areas will be included in the FOSTL. Building 134 was removed from the FOST and will be included as part of CO-5 in the FOSTL.  |
| 13. | The Parcel 10 designation appears to be absent from Figures 2 through 7 and 9. Please include the Parcel 10 designation in these figures.   | The FOST figures were revised to incorporate this comment.  |
| 14. | The parcel numbers on the figures are extremely difficult to read, and in some cases impossible. Please implement a change (i.e., different color) to remedy this problem.  | The FOST figures were revised to incorporate this comment.  |
| 15. | The parcel boundaries and associated parcel numbers are not clearly delineated on the figures (eastern portion only). Please clearly mark the parcels boundaries and associated parcel numbers on the figures.  | The FOST figures were revised to incorporate this comment.  |
| 16. | There appear to be several buildings/structures located on the transfer parcels (see figures) that are not labeled or discussed in the FOST. Please ensure that all buildings/structures located in the transfer parcels are clearly marked on the figures and discussed in the FOST.<br><br>It would be helpful if the buildings/structures were shown in a different color (other than grey). This would help distinguish buildings/structures from objects depicted in the figures that may not be considered a building/structure (i.e., runways and parking lots). | All buildings/structures located on the transfer parcels are identified on the figures and tables except for Structure 10P (a well casing) which could not be specifically located on the figure.<br><br>Three detailed figures were added to the FOST to help distinguish buildings/structures from other objects. Figures 4, 5, and 6 are detailed maps showing buildings and structures located within the northwestern (Parcel 23 and portions of 1, 16, 24, and 40), central (portions of Parcels 16, 17, 24, 27, and 40), and southeastern (Parcels 29, 34, 35, and 36, and portions of 28, 40, and 41) transfer parcels, respectively. On these figures, the buildings are shown in black, not grey. |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|     | GENERAL COMMENTS   | RESPONSES   |
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| 17. | There are numerous acronyms used throughout the document that have not been included on pages v and vi. Please be sure to include, on pages v and vi, all acronyms used throughout the document. | The acronym list was revised to include all acronyms used in the FOST text.   |
| 18. | Please ensure that all shaded areas of the FOST are updated.   | The draft final FOST includes two shaded areas referencing 1) the date of DTSC's concurrence/ position letter on the FOST (Section 8.0) and 2) the date of the accompanying FOSL (Attachment 1). This information will be updated in the final FOST, when the highlighted information is available. |
| 19. | Please include, in the Attachments, a copy of the Department of Defense (DoD) policies on Asbestos, Lead-Based Paint (LBP), and Radon at Base Realignment and Closure (BRAC) properties.         | The Department of Defense (DoD) policies on Asbestos, Lead-Based Paint (LBP), and Radon at Base Realignment and Closure (BRAC) properties is included as Attachment 4 to the FOST.  |

20-29 March 2002 Comments to Draft FOST from: Ms. Jennifer Rich, Remedial Project Manager, DTSC

|    | SPECIFIC COMMENTS   | RESPONSES  |
|----|---|--|
| 1. | Page vi, Acronyms/ Abbreviations<br><br>Please change "preliminary environmental assessment" to "preliminary endangerment assessment".  | The FOST was revised to incorporate this comment.  |
| 2. | Section 1.0 - Purpose, Page 1, Paragraph 2<br><br>Please include the NFA Installation Restoration Program (IRP) sites when describing IRP sites associated with carve-out (CO) areas.   | The referenced section was revised and is as follows in the FOST:<br><p>"These carve-out (CO) areas include Installation Restoration Program (IRP) Sites 1, 3, 5N, 5S(a), 11, 12, 13S, 13W, and 16. The CO areas also include IRP Sites 9A and 13E, and portions 9B that have received regulatory concurrence for no further action (NFA)."</p> <p>Further discussion of these IRP sites is included in Section 2.0.</p> |
| 3. | Section 2.0 - Property Description, Page 2, Paragraph 4<br><br>To avoid confusing FOST #3 with the other FOSTs depicted on Figure 2, please change the first sentence to read, "The boundaries of this FOST, depicted on Figure 2, enclose Parcels 1, 2, 16, 17, 18, 19, 20, 22, 23, 24, 27, 28, 29, 34, 35, 36, and portions of Parcels 40 and 41."<br><br>Please update the acreage figures based on general comments #1 through 3 above. | The referenced sentence was revised to incorporate this comment.<br><br>The acreage figures were updated to reflect the revised CO areas.  |
| 4. | Section 2.0 - Property Description, Page 3, First Full Paragraph<br><br>If a building/structure, AOC, or UST/ AST site are located on more than one parcel, DTSC would like to have that information included in the FOST. This type of information has been included in previous FOSTs. Not only is it pertinent information for DTSC to have, but also for the transferee. Please make the necessary changes.                             | Section 2 of the FOST and Tables 1, 2, 3, 6, and 7 were revised to indicate if a building/structure or AOC site is located on more than one parcel. Per the EBS, no UST/AST site in the transfer property is located on more than one parcel.<br><br>The referenced paragraph was deleted from the FOST.   |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|    | SPECIFIC COMMENTS  | RESPONSES   |
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| 5. | <p>Section 2.1 - Parcel 1 (Portions), Page 3</p> <p>Paragraph 3: Figure 5-13 in the Final Basewide EBS (March 2001) shows both a UST-133 and UST-133B, whereas Table 3 only shows UST-133. If there is an additional UST site, please update this paragraph, Table 3 and any other pertinent sections of the FOST.</p> <p>Paragraph 3: Please refer to general comment #2 above. Please update the text accordingly.</p> <p>Paragraph 5: The FOST states that, "Parcel 1 is anticipated to be transferred for educational use." Does the Reuse Plan for Tustin provide more detail regarding "educational use" (i.e., elementary school, high school, community college, etc.)? The BRAC Business Plan 2000 in Review designates the land use of Parcel 1 as "Learning Village". Does the Reuse Plan for Tustin list other uses for the "Learning Village"/Parcel 1 besides educational use?</p>   | <p>UST 133 was redesignated as UST 133B (see discussion in Table 3). There is not an additional UST site. No revisions were made to the FOST per this comment except to add "(UST133B)" under "UST 133" in Table 3.</p> <p>Site UST-135 and sites AST-194A and AST-194B were removed from the FOST and are included in the CO areas.</p> <p>The Reuse Plan does not provide more detail regarding "educational use".</p> <p>See response to General Comment #9. The referenced sentence was revised and is as follows:<br/> "Parcel 1 is anticipated to be transferred for recreational use."</p>                   |
| 6. | <p>Section 2.2 - Parcel 16 (Portions), Page 4</p> <p>Please refer to general comment #1 above.</p> <p>Paragraph 3: The text is not consistent with Figure 4 and Table 2. Both the figure and the table show 11 AOCs, not 6. The paragraph also incorrectly states that all AOCs have received regulatory concurrence for NFA (ST-16A and ST-16B have not). Please make the necessary corrections.</p> <p>Paragraph 3: Please add the following sentence to the end of the paragraph, "No UST/AST sites are located in the transfer portions of Parcel 16."</p> <p>Paragraph 5: The FOST states that, "Parcel 16 is anticipated to be transferred for commercial/business use." The BRAC Business Plan 2000 in Review designates the land use of Parcel 16 as "Community Core". What exactly does "community core" mean? Does the Reuse Plan for Tustin allow for other uses besides commercial/business for Parcel 16 (i.e., educational, child care, hospital, etc.)?</p> | <p>Sites ST-16A and ST-16B were removed from the FOST and are included in CO-7.</p> <p>The text, table, and figure were revised to be consistent with the following:<br/> "Eight AOCs, which have all received regulatory concurrence for NFA, are located on the transfer portion of Parcel 16 (Table 2)."</p> <p>The text was revised to incorporate this comment.</p> <p>"Community Core" is the geographical center of the commercial/business areas. The Reuse Plan designates Parcel 16 as commercial/business use and not for child care or educational uses.</p> <p>See response to General Comment #9.</p> |
| 7. | <p>Section 2.3 - Parcel 17 (Portions), Page 4</p> <p>Paragraph 4: The FOST states that, "Parcel 17 is anticipated to be transferred for educational use." The BRAC Business Plan 2000 in Review designates the land use of Parcel 17 as a "High School". Is the educational use specifically for a high school?</p>  | <p>Yes, it is designated for use specifically as a high school.</p> <p>See response to General Comment #9. The referenced sentence was revised and is as follows:<br/> "Parcel 17 is anticipated to be transferred for educational/recreational use."</p>   |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|     | SPECIFIC COMMENTS  | RESPONSES   |
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| 8.  | <p>Section 2.4 - Parcel 23, Page 5</p> <p>Paragraph 1: Please revise the text from "housing units" to "residential buildings". Then, ensure that the number of buildings is correct.</p> <p>Also, please ensure that the text is consistent with Sections 8.7.1, 8.7.2.1 and Table 1.</p> <p>Paragraph 2: The FOST states that, "Parcel 23 is anticipated to be transferred for residential use." Does the Reuse Plan for Tustin allow for schools or day care facilities on this parcel?</p>  | <p>The text was revised throughout the FOST to incorporate this comment.</p> <p>The text and table are consistent.</p> <p>The Reuse Plan does not designate this Parcel for schools or day care facilities.</p> <p>See response to General Comment #9.</p>  |
| 9.  | <p>Section 2.5 - Parcel 24 (Portions), Page 5</p> <p>Paragraph 4: The FOST states that, "Parcel 24 is anticipated to be transferred for residential use." Does the Reuse Plan for Tustin allow for schools or day care facilities on this parcel?</p>  | <p>The Reuse Plan does not designate this Parcel for schools or day care facilities.</p> <p>See response to General Comment #9.</p>   |
| 10. | <p>Section 2.6 - Parcel 27 (Portions), Page 5</p> <p>Paragraph 3: The text is not consistent with Figure 4 and Table 2. Both the figure and the table show 2 AOCs, not 7. Both of the AOCs, not 5, have received regulatory concurrence for NFA. The paragraph also incorrectly states that Sites ST-16A and ST-16B are in Parcel 27. They are actually in Parcel 16. Please make all the necessary corrections.</p> <p>Paragraph 5: The FOST states that, "Parcel 27 is anticipated to be transferred for residential use." Does the Reuse Plan for Tustin allow for schools or day care facilities on this parcel?</p> | <p>The text, table, and figure were revised to be consistent with the following:<br/> "Two AOCs (including one partially located in Parcel 40) are located within the transfer portion of Parcel 27. These AOCs have received regulatory approval for NFA (Table 2). No UST/AST sites are located on the transfer portions of Parcel 27."</p> <p>The Reuse Plan does not designate this Parcel for schools or day care facilities.</p> <p>See response to General Comment #9.</p> |
| 11. | <p>Section 2.7 - Parcel 28 (Portions), Page 6</p> <p>Paragraph 4: The FOST states that, "Parcel 28 is anticipated to be transferred for residential use." Does the Reuse Plan for Tustin allow for schools or day care facilities on this parcel?</p>  | <p>The Reuse Plan does not designate this Parcel for schools or day care facilities.</p> <p>See response to General Comment #9.</p>   |
| 12. | <p>Section 2.8 - Parcel 29, Page 6</p> <p>Paragraph 2: Please see general comment #4 above and update the text accordingly.</p> <p>Paragraph 4: The FOST states that, "Parcel 29 is anticipated to be transferred for residential use." Does the Reuse Plan for Tustin allow for schools or day care facilities on this parcel?</p>  | <p>The text was revised to include the following:<br/> "Regulatory concurrence for NFA has been received for all of the AOCs."</p> <p>The Reuse Plan does not designate this Parcel for schools or day care facilities.</p> <p>See response to General Comment #9.</p>  |

Response to Comments (continued)  
Finding of Suitability to Transfer  
Marine Corps Air Station Tustin, California

|     | SPECIFIC COMMENTS  | RESPONSES  |
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| 13. | <p>Section 2.9 - Parcel 34, Page 6</p> <p>Paragraph 3: Please revise the text from "housing units" to "residential buildings". Then, ensure that the number of buildings is correct.</p> <p>Also, please ensure that the text is consistent with Sections 8.7.1, 8.7.2.1 and Table 1.</p> <p>Paragraph 4: The FOST states that, "Parcel 34 is anticipated to be transferred for residential use." Does the Reuse Plan for Tustin allow for schools or day care facilities on this parcel?</p>  | <p>The text was revised throughout the FOST to incorporate this comment.</p> <p>The text and table are consistent.</p> <p>The Reuse Plan does not designate this Parcel for schools or day care facilities.</p> <p>See response to General Comment #9.</p>   |
| 14. | <p>Section 2.10 - Parcel 35, Page 7</p> <p>Paragraph 1: In looking at Figure 2, it does not appear to be consistent with the text in this paragraph. It is difficult to tell because the area is not properly identified in the figure. Please make any necessary corrections.</p> <p>Paragraph 3: Please revise the text from "housing units" to "residential buildings". Then, ensure that the number of buildings is correct.</p> <p>Please revise the text to account for the residential buildings from Irvine Park South which are within Parcel 35.</p> <p>Finally, please ensure that the text is consistent with Sections 8.7.1, 8.7.2.1 and Table 1.</p> <p>Paragraph 4: The FOST states that, "Parcel 35 is anticipated to be transferred for residential use." Does the Reuse Plan for Tustin allow for schools or day care facilities on this parcel?</p> | <p>The text and figures were revised to indicate the following:<br/>"Parcel 35 (Figure 2) consists of approximately 64 acres located in the eastern portion of MCAS Tustin and is bordered by Parcel 36 to the south, by city of Tustin boundaries to the southeast, by portions of Parcel 40 to the northeast, and portions of Parcel 41 to the west and northwest. Parcel 34 is situated to the northeast and Parcels 28 and 29 are located west and northwest."</p> <p>The text was revised throughout the FOST to incorporate this comment.</p> <p>The text was revised and is as follows:<br/>"One building, four structures and 121 multi-plex residential buildings (67 in Moffett Meadows Housing and 54 in Irvine Park South Housing) are located on Parcel 35 (Table 1, Figures 3 and 6)."</p> <p>The text and table are consistent.</p> <p>The Reuse Plan does not designate this Parcel for schools or day care facilities.</p> <p>See response to General Comment #9.</p> |
| 15. | <p>Section 2.11 - Parcel 36, Page 7</p> <p>Paragraph 3: Please revise the text from "housing units" to "residential buildings". Then, ensure that the number of buildings is correct.</p> <p>Also, please ensure that the text is consistent with Sections 8.7.1, 8.7.2.1 and Table 1.</p> <p>Paragraph 4: The FOST states that, "Parcel 36 is anticipated to be transferred for residential use." Does the Reuse Plan for Tustin allow for schools or day care facilities on this parcel?</p>   | <p>The text was revised throughout the FOST to incorporate this comment.</p> <p>The text and table are consistent.</p> <p>The Reuse Plan does not designate this Parcel for schools or day care facilities.</p> <p>See response to General Comment #9.</p>   |
| 16. | <p>Section 2.12 - Parcel 40 (Portions), Page 7</p> <p>Paragraph 2: Isn't the majority of Carve-Out Area 9 (CO-9) from Parcel 40 (the area isn't properly identified in the figures)? If so, please make the correction.</p>  | <p>The CO areas were revised. The text and figures were revised to indicate the following:<br/>"Some areas of Parcel 40 have been carved out (CO-5, CO-7, CO-8, CO-9 and CO-10) for LIFOC (Figure 2), leaving 24 acres available for transfer."</p>  |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|     | SPECIFIC COMMENTS  | RESPONSES   |
|-----|--|---|
| 17. | <p>Section 2.13 - Parcel 41 (Portions), Page 8</p> <p>Paragraph 3: The paragraph states that there are no buildings/structures located in the parcel. However, in looking at the figures, there appears to be buildings/structures located in Parcel 41. Unfortunately, all portions of Parcel 41 are not properly labeled. Please explain and make any necessary corrections to the FOST.</p>   | <p>The figures were revised to indicate the following:<br/>           "No buildings/structures, AOCs, or UST/AST sites are located in this parcel."</p> <p>No revisions to the text or tables were made per this comment.</p>   |
| 18. | <p>Section 5.0 - Environmental Baseline Survey History and Findings</p> <p>Paragraph 3: When discussing the Installation Restoration Program (IRP) sites that are located in the carve out areas, please include the appropriate IRP sites from the Operable Unit 2 (OU-2) Record of Decision (ROD), and then go onto explain that they have received regulatory concurrence for no further action.</p> <p>Paragraph 3: For consistency, a brief status of OU-3 (IRP-1) should be given in this paragraph.</p> | <p>The text was revised to include the following:<br/>           "IRP Sites 2, 9A, 9B, and 13E have received regulatory concurrence for NFA and are classified as Area Type 4. These sites were evaluated as Operable Unit (OU) -2 that received final closure with the signing of the OU-2 NFA ROD/Remedial Action Plan (RAP) in September 2000 (Attachment 2)."</p> <p>The text was revised to include the following:<br/>           "IRP-1 includes areas of soil and groundwater contamination and is being evaluated as OU-3. The OU-3 ROD was signed in December 2001 and the remedy (containment wall with monitoring) is in place."</p> |
| 19. | <p>Section 6.0 - Environmental Findings, Page 10</p> <p>Paragraph 1: Figure 9 is much needed, especially because it shows the MTBE plume. However, there should be a note (text and figure) explaining that it does not include all contamination associated with each parcel (i.e., AOCs, USTs [except for #222], ASTs). Without the explanation, it is misleading.</p> <p>Paragraph 2: Please refer to general comments #1, 2, 4 and 6 above.</p>  | <p>The text and figure were revised to include the following:<br/>           "Figure 9 shows areas of contamination associated with each parcel. Figure 9 does not show contamination associated with each individual AOC, UST, or AST."</p> <p>The text was revised, and includes the following:<br/>           "All of the AOCs have been assigned Area Types 1 through 4 (Table 2). All of the UST/AST sites have been assigned Area Type 1 or 2 (Table 3). Signature pages from the concurring regulatory agencies for all of the AOCs and UST/AST sites are included in Attachment 2."</p>   |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|     | SPECIFIC COMMENTS   | RESPONSES   |
|-----|---|---|
| 20. | <p>Section 7.0 - Environmental Findings in CO Areas</p> <p>This section is labeled "Environmental Findings in CO Areas". The discussion in this section should not be limited to IRP sites within the CO Areas. While UST-222 is mentioned in the discussion on IRP-13S, it should be listed in its own paragraph.</p> <p>Also, based on general comments #1, 2 and 3 above, there will be additional carve out areas that are not associated with a particular IRP site. Please include discussions in Section 7.0 regarding these other sites (ST-16A, ST-16B, UST-135, AST-194A, AST-194B, and Mooring Pads 4 and 5).</p> <p>Paragraph 1: Please update the acreage based on general comments #1 through 3 above.</p> <p>Paragraph 2 (IRP-1), Sentence 1: In looking at the figure, it appears that a large portion of IRP-1 is in Parcel 40 (not clearly labeled in figure). Please make the correction.</p> <p>Paragraph 2, Sentence 4: Please delete "remedial".</p> <p>Paragraph 2, Last Sentence: The Operations and Maintenance Plan is scheduled to be completed in "2002" not "2001". Please make the change.</p> <p>Paragraph 3 (IRP-3): In order to be consistent with the other IRP discussions, please provide a sentence or two regarding the OU-1B Feasibility Study (FS) and Proposed Plan.</p> <p>Paragraph 3, Line 4: Please insert "due to" between "been" and "inactive".</p> | <p>The discussion in this section is intended to be brief, further detail on the IRPs, AOCs, USTs/ ASTs, and areas under evaluation (Mooring Pads) is provided in the FOSL. This section was not revised per this comment.</p> <p>The CO areas were revised. The first paragraph of this section was revised and is as follows:</p> <p>"This section discusses the nine active IRP sites within the CO areas that have ongoing investigations (Figure 9). These sites, their buffer zones, various AOCs, USTs, ASTs, and other areas under evaluation have been carved out of the parcels described in this FOST because of the presence of soil and/or groundwater contamination, and associated ongoing investigations. The CO areas cover approximately 315 acres. They establish buffer zones where lease restrictions can be imposed to prevent human exposure to potential contaminants while remedial action is being evaluated. These areas will be included in LIFOCS. A separate FOSL will be issued to support the LIFOCS. IRP Sites 1, 3, 5N, 5S(a), 11, 12, 13S, 13W, and 16, various AOCs, USTs, ASTs, and other areas under evaluation will be discussed in greater detail in the FOSL."</p> <p>The text and figure were revised to indicate the following:</p> <p>"IRP-1, Moffett Trenches and Crash Crew Burn Pits (Figure 6), located within Parcel 40, and portions of Parcels 28 and 41,..."</p> <p>The referenced sentence was revised to incorporate this comment.</p> <p>The referenced sentence was revised to incorporate this comment.</p> <p>The following sentence was added to the end of the referenced paragraph:</p> <p>"Possible alternatives for the remediation of groundwater contamination were presented in the January 2002 FS for OU-1B, and the Proposed Plan is scheduled to be finalized in April 2002."</p> <p>The referenced sentence was revised to incorporate this comment.</p> |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|                | SPECIFIC COMMENTS   | RESPONSES   |
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| 20.<br>(cont.) | <p>Paragraph 5 (IRP-11): The two BNI references are not included in Attachment 1. Please make the correction.</p> <p>Please also update the last two sentences in this paragraph.</p> <p>Paragraph 6 (IRP-12): In sentence four it states that "... two smaller volatile organic compound (VOC) plumes have been identified in the second water-bearing zone." Please be sure this is consistent with the Final OU-1B FS. On page 1-90 of the Final OU-1B FS it discusses a single plume in the second water-bearing zone. Please make the appropriate corrections.</p> <p>Also, please update the last sentence showing 9 remedial alternatives instead of 7 and the draft final OU-1B FS going to final with the appropriate date.</p> <p>Paragraph 7 (IRP-13S): Although it was discussed in Section 5.0, please briefly discuss the Time Critical Removal Action in this paragraph, as well.</p> <p>Paragraph 8 (IRP-13W): The OHM reference is not included in Attachment 1. Please make the correction.</p> <p>The Basewide EBS (page 5-9) states that petroleum hydrocarbons, selected metals, and PAHs and TCE were found in soil and that TCE was also found in groundwater. Please make the necessary corrections to this paragraph.</p> <p>Paragraph 9 (IRP-16): Please update the last two sentences.</p> | <p>The text was revised as follows:<br/> "The site was investigated and soil was subsequently recommended for NFA (BNI 2001a). Remedial alternatives for TCE-impacted groundwater cleanup are being OU-4 focused FS report that is scheduled for completion in 2003."</p> <p>Attachment 1 was revised to include the following:<br/> "BNI. 2000. Draft Focused Feasibility Study Report for Operable Unit-4, Marine Corps Air Station Tustin, CA. Prepared for Southwest Division Naval Facilities Engineering Command. November."</p> <p>The referenced sentences were revised and are as follows:<br/> "Remedial alternatives for TCE-impacted groundwater cleanup are being evaluated in the OU-4 focused FS report that is scheduled for completion in 2003."</p> <p>The referenced sentence was revised and is as follows:<br/> "Two VOC plumes have been identified in the first water-bearing zone, and smaller VOC plumes has been identified in the second water-bearing zone."<br/> This is consistent with the OU-1B FS (page 1-91 and 1-92).</p> <p>The referenced sentence was revised and is as follows:<br/> "Seven remedial alternatives were evaluated in the January 2002 OU-1B FS Report. The Proposed Plan is scheduled for completion in April 2002."</p> <p>The following sentences are included at the end of the referenced paragraph:<br/> "A Time-Critical Removal Action is being conducted to treat the TCE and 1,2,3-TCP plume, and the FS for OU-1A is currently being prepared. The draft FS is scheduled to be issued in September 2002."</p> <p>The text was revised as follows:<br/> "A soil removal action was recommended, and approximately 3,700 tons of soil were removed in November 1997 (BNI 2001)."</p> <p>Per the EBS, the text was revised as follows:<br/> "Petroleum hydrocarbons, selected metals, and polynuclear aromatic hydrocarbons were found in soil and TCE was found in soil and groundwater."</p> <p>The text was revised as follows:<br/> "Remedial alternatives for contaminated groundwater are being evaluated in the OU-4 focused FS which is scheduled for completion in 2003."</p> |

Response to Comments (continued)  
 Finding of Suitability to Transfer  
 Marine Corps Air Station Tustin, California

|     | SPECIFIC COMMENTS  | RESPONSES  |
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| 21. | <p>Section 8.0 - Use Restrictions and Notifications, Page 13</p> <p>Because the RWQCB uses other than risk based cleanup standards to make its NFA determinations for UST/AST sites, DTSC would like a notification in the deed to inform future land owners of the cleanup criteria used at these sites. Please incorporate a new sub-section in Section 8.0 titled "Notification - Underground and Aboveground Storage Tanks".</p> <p>Please include the following statements "Underground storage tanks (USTs) have been removed in Parcels 1 and 29. Aboveground storage tanks (ASTs) have been removed in Parcel 28. These USTs and ASTs were removed according to standards promulgated by the Santa Ana Regional Water Quality Control Board (SA-RWQCB). The SA-RWQCB uses water protection standard as its guidelines, in order to protect the health of surface and subsurface waters. These standards do not include a risk based approach to cleanup and therefore on a case by case basis may not be as protective as a risk based approach to cleanup may be."</p> <p>"As a result of the standards utilized in the cleanup at these UST/AST sites, hazardous substances contained in petroleum products may have been left at the sites at levels that are not protective of human health."</p> <p>Paragraph 1: It states that, "Additional scrutiny was given to the environmental factors associated with parcels being transferred for ultimate use as a school site." Specifically, what was the additional scrutiny that was given?</p> | <p>The RWQCB does not require risk-based standards for UST and AST site closures. All site investigations and remedial actions have been completed for the sites that the RWQCB has concurred with the recommendations for closure per the California Code of Regulations. Therefore, no additional discussion is necessary.</p> <p>The Navy understands this is an "Unresolved Comment" and it will be attached to this FOST per the BRIM guidelines.</p> <p>The text was revised to be consistent with FOST 2. The referenced sentence is as follows:<br/>       "In addition, the environmental factors associated with parcels being transferred for ultimate use as a school site were considered."</p> |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|     | SPECIFIC COMMENTS  | RESPONSES   |
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| 22. | <p>Section 8.1 - Notification - Pesticides</p> <p>Paragraph 1, Sentence 3: According to the Final Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the disposal and reuse of MCAS Tustin, dated December 1999, Parcels 16 and 24 (or portions thereof) are called out as "prime farmland." Please include Parcels 16 and 24 in this sentence. Parcel 24 is discussed throughout Section 8.1. Parcel 16 should also be discussed throughout Section 8.1.</p> <p>Paragraph 1, Sentence 6: Please change to read, "Monthly pesticide use reports were submitted to Cal-EPA, Department of Pesticide Regulation, by the former lessee, Osumi Farms, regarding pesticide use on parcels under cultivation." (See Basewide EBS [p. 5-49]).</p> <p>Paragraph 2, Sentence 3: Please delete "on".</p> <p>Paragraph 4: Please reference all the parcels that were included in the 1996 investigation and then specify those parcels applicable to this FOST.</p> <p>Paragraph 5: Please provide a copy, in Attachment 2, of the regulatory concurrence for the 1996 Pesticide Investigation Report.</p> <p>Paragraph 6: This paragraph incorrectly states that the 27 May 1992 NFA concurrence letter from DTSC is provided in Attachment 2. Please include a copy of the letter in Attachment 2.</p> <p>Paragraph 7: Please provide a copy, in Attachment 2, of the regulatory concurrence for the RI Report.</p> | <p>The section was revised, the first paragraph is as follows:<br/> "Agricultural areas are located on Parcels 17, 24, 27, 28, 29, and 40. Portions of Parcels 17, 24, 27, and 28 are contained in CO-5, CO-8, and CO-10. The following summarized notifications that are required because pesticides and herbicides have previously been applied to these parcels."</p> <p>Parcel 16 was added to the prime farmland notification but not to the pesticide notification. The EIS/EIR identifies Parcel 16 as prime farmland, "land with the best combination of physical and chemical features for the production of agricultural crops." Parcel 16 was never used for agricultural purposes and pesticides were not used on this parcel (see 1996 Pesticide Investigation Report).</p> <p>The referenced sentence was revised to incorporate this comment.</p> <p>The referenced sentence was revised to incorporate this comment.</p> <p>The referenced paragraph was revised and includes the following sentences:<br/> "In 1996, soil samples were collected from the southwest corner (Parcel 6) and the northeast quadrant (Parcels 17, 25, 26, 27, 28, 29, 30, 31, 32, and 40) of MCAS Tustin to evaluate whether residual pesticides and metals were present in soil as a result of past agricultural activities at MCAS Tustin (BNI 1996b)."</p> <p>The following sentence is included in Section 8.1, paragraph 6, and the referenced letter is included in Attachment 2:<br/> "The 1996 Pesticides Investigation Report was reviewed by the BCT whose comments were incorporated (see 15 July 1996 letter in Attachment 2)."</p> <p>The referenced letter is included in Attachment 2 of the revised FOST.</p> <p>Investigation reports are not required to have regulatory concurrence, they are used as supporting information for future decision documents.</p> |

Response to Comments (continued)  
 Finding of Suitability to Transfer  
 Marine Corps Air Station Tustin, California

|     | SPECIFIC COMMENTS   | RESPONSES  |
|-----|---|--|
| 23. | <p>Section 8.2 - Notification - Polychlorinated Biphenyls</p> <p>Paragraph 1: Concerning the small capacitor at Building 218, was corrective action not taken because the base was still open? If this was the case, then explain why corrective action has not been taken since the base closed in 1999.</p> <p>Paragraph 4, Sentence 4: This paragraph and Table 6 are not consistent. Paragraph 4 states, "Transformers tested for PCBs during this study that are located within the boundaries of the transfer parcels all contained PCBs at concentrations equal to or less than 14 ppm." However, Table 6 shows that Building 5 had two transformers with maximum PCB content of 32 ppm and 51 ppm. According to Table 6, the transformer containing 51 ppm of PCBs was replaced, but the other transformer was not. Please correct the inconsistencies.</p> | <p>Corrective action was not conducted because observation and/or sampling were not possible without dismantling the motor and destroying the capacitor.</p> <p>The referenced sentence was revised and is as follows:<br/>       "Transformers tested for PCBs during this study that are currently located within the boundaries of the transfer parcels all contained PCBs at concentrations equal to or less than 32 ppm."</p>   |
| 24. | <p>Section 8.3 - Notification - Prime/Unique Farmland, Page 17</p> <p>According to the Final Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the disposal and reuse of MCAS Tustin, dated December 1999, Parcels 16 and 24 (or portions thereof) are called out as "prime farmland." Please include Parcels 16 and 24.</p>   | <p>The first sentence of this paragraph was revised and is as follows:<br/>       "Parcels 16, 17, 24, 27, 28, 29, and 40 contain prime farmland."</p>   |
| 25. | <p>Section 8.6 - Notifications and Restrictions - Asbestos-Containing Material</p> <p>Paragraph 1, Sentence 2: Please include the appropriate reference (i.e., DoD 1994b).</p> <p>Paragraph 3, Sentence 1: What is DON's policy regarding conducting FAD ACM surveys when the building/structure is "to be determined (TBD)"? It appears to be consistent with buildings/structures slated for demolition.</p>  | <p>The referenced sentence was revised to incorporate this comment.</p> <p>For buildings/structures with a TBD disposition, the transferee assumes responsibility for the management of ACM, including the surveys, removal and/or management of ACM prior to or during <u>demolition</u>, in accordance with all applicable local, state, and federal laws, <u>AND</u> if the transferee chooses to <u>occupy the buildings</u> on an interim basis, the transferee assumes responsibility for the management of ACM in accordance with applicable laws prior to occupancy or renovation.</p> |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|     | SPECIFIC COMMENTS  | RESPONSES   |
|-----|--|---|
| 26. | <p>Section 8.6.1.1 - Buildings/Structures Planned for Demolitions or "To be Determined (TBD)"</p> <p>The proposed disposition for Structure 215 in Table 1 shows "To be determined" yet the structure is not listed in this section. Table 7 lists the proposed disposition of Structure 215 as "Field" and Section 8.6.1.2 has Structure 215 listed for reuse. Please correct the inconsistencies.</p> <p>Building 5: Table 7 shows that only the 2001 asbestos survey reported FAD ACM, not the 1988 survey as stated here in this section. Please correct the error.</p> <p>Irvine Park North Housing and Irvine Park South Housing: Irvine Park South housing is also located in Parcel 35. Please revise the text accordingly.</p>  | <p>The proposed disposition for Structure 215 is "To be determined". The FOST was revised to make all tables and text consistent with this.</p> <p>The referenced sentence was revised as follows:<br/> <i>"Building 5 was built in 1943 and is located in Parcel 1. The 1988 asbestos survey reported ACM in the building and the 2001 asbestos surveys reported FAD ACM. See Table 7 for a description."</i></p> <p>The text was revised to incorporate this comment. The following sentence is included in the referenced section:<br/> <i>"Irvine Park North Housing and Irvine Park South Housing Communities were built between 1979 and 1982 and are located in Parcels 34, 35, and 36."</i></p>   |
| 27. | <p>Section 8.6.1.2 - Buildings/Structures Planned for Reuse</p> <p>For several of the buildings and a structure, DON states that it is considering conducting a FAD ACM revalidation survey in 2002.</p> <p>The DOD Policy on Asbestos at BRAC Properties states, "Asbestos-containing material shall be remedied prior to property disposal only if it is of a type and condition that is not in compliance with applicable laws, regulations, and standards, or if it poses a threat to human health at the time of transfer of the property." Without ever having conducted a survey, DON cannot be sure the policy has been met for the buildings/structures listed in this section. Therefore, isn't DON required to survey buildings/structures slated for reuse that have never been surveyed for asbestos?</p> <p>Building 213: Table 7 shows that only the 2001 asbestos survey reported FAD ACM, not the 1988 survey as stated here in this section. Please correct the error.</p> <p>Structure 215: Table 1 shows the proposed disposition as "To be determined". Is Table 1 or this section correct? Table 7 lists the proposed disposition of Structure 215 as "Field" and Section 8.6.1.2 has Structure 215 listed for reuse. Please make the appropriate corrections.</p> | <p>This section (8.6.1.2 - Notifications) was revised and all references to DON conducting a revalidation survey were deleted from the text. The notifications state: "This structure/building has never been surveyed for asbestos".</p> <p>If no ACM survey has ever been performed, then buildings will be restricted from occupancy until the necessary surveys and abatement have been conducted in accordance with all local, state, and federal requirements.</p> <p>Per the DoD policy, if a condition is found that "...is of a type and condition that is not in compliance with applicable laws, regulations, and standards, or if it poses a threat to human health at the time of transfer of the property", then the ACM will be remedied under negotiated terms of the transfer document.</p> <p>The referenced sentence was revised as follows:<br/> <i>"Building 213 was built in 1973 and is located on Parcel 1. The 1988 asbestos survey reported ACM in the buildings and the 2001 asbestos surveys reported FAD ACM in the building."</i></p> <p>The proposed disposition for Structure 215 is "To be determined". The FOST was revised to make all tables and text consistent with this.</p> |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|     | SPECIFIC COMMENTS  | RESPONSES  |
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| 28. | <p>Section 8.6.2.1 - Buildings/Structures Planned for Demolition or "To be Determined (TBD)"</p> <p>Paragraph 2, Last Sentence: In order for consistency between paragraphs 1 and 2, please change the sentence to state, "If the transferee chooses to occupy the buildings on an interim basis, the transferee must conduct the necessary ACM surveys and abatement according to all local, state, and federal requirements prior to occupancy or renovation."</p> <p>Paragraph 4: The proposed disposition of some of the buildings and structures listed in this paragraph are "To be Determined (TBD)." No ACM surveys have been conducted at these buildings/structures. Since a building/structure that is slated for "TBD" could potentially be reused, how does the DON meet its obligation under its own policy without conducting a survey? The DoD Policy on Asbestos at BRAC Properties states, "Asbestos-containing material shall be remedied prior to property disposal only if it is of a type and condition that is not in compliance with applicable laws, regulations, and standards, or if it poses a threat to human health at the time of transfer of the property." Without ever having conducted a survey, DON cannot be sure the policy has been met for the buildings/structures listed as TBD. Therefore, isn't DON required to survey buildings/structures slated for TBD (potential reuse) that have never been surveyed for asbestos?</p> | <p>The referenced sentence was revised to incorporate this comment.</p> <p>If no ACM survey has been conducted, then a building is restricted from occupancy prior to demolition. The deed will indicate that the transferee assumes responsibility for the management of ACM, including surveys, removal and/or management of ACM prior to or during demolition, in accordance with applicable laws. The building may only be occupied on an interim basis if the transferee conducts the necessary ACM surveys and abatement according to all local, state, and federal requirements prior to occupancy or renovation.</p> <p>Per the DoD policy, if a condition is found that "...is of a type and condition that is not in compliance with applicable laws, regulations, and standards, or if it poses a threat to human health at the time of transfer of the property", then the ACM will be remedied under negotiated terms of the transfer document.</p> |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|     | SPECIFIC COMMENTS   | RESPONSES   |
|-----|---|---|
| 29. | <p>Section 8.6.2.2 - Buildings/Structures Planned for Reuse</p> <p>Building 213: Please state that the restriction will be included in the deed.</p> <p>Building 218: Please delete "if any is detected in the building" because ACM was found in the building (See Table 7).</p> <p>Paragraph 4: DON states that it is considering conducting a FAD ACM revalidation survey in 2002 for the buildings and structure listed in this paragraph.</p> <p>The DOD Policy on Asbestos at BRAC Properties states, "Asbestos-containing material shall be remedied prior to property disposal only if it is of a type and condition that is not in compliance with applicable laws, regulations, and standards, or if it poses a threat to human health at the time of transfer of the property." Without ever having conducted a survey, DON cannot be sure the policy has been met for the buildings/structures listed in this paragraph and paragraph 5 below. Therefore, isn't DON required to survey buildings/structures slated for reuse that have never been surveyed for asbestos? The paragraph also states that the buildings and structure will be restricted from occupancy pending the findings of the revalidation survey.</p> <p>Please indicate that this restriction will be included in the deed.</p> <p>Paragraph 5: For the structures listed in this paragraph, DON states that they will not be conducting FAD ACM revalidation surveys because the structures are not "designed for human occupancy." According to the DOD Policy on Asbestos at BRAC Properties, "The survey report or document shall include: reasonably available information on the type, location, and condition of asbestos in any building or improvement on the property..." Improvements on the property should include structures. The structures listed in this paragraph, which are slated for reuse and have never been surveyed, should be surveyed regardless of whether or not they are "designed for human occupancy." These structures should be restricted from use pending the findings of the survey and the restriction should be included in the deed.</p> <p>Please make all the necessary corrections to Section 8.6.2.2 based on the comments listed directly above.</p> | <p>The following sentence was added to the beginning of Section 8.0:<br/>         "All the following restrictions listed in this section will be incorporated into the deed(s)."</p> <p>The referenced sentence was revised to incorporate this comment.</p> <p>This Section (8.6.2.2 - Restrictions) The text was revised to indicate that buildings scheduled for reuse, that have never been surveyed for asbestos, will be restricted from occupancy until the transferee conducts the necessary surveys and abatement according to all local, state, and federal requirements. References to DON conducting a revalidation survey have been deleted from the text.</p> <p>If no ACM survey has ever been performed, then buildings will be restricted from occupancy until the necessary surveys and abatement have been conducted in accordance with all local, state, and federal requirements.</p> <p>Per the DoD policy, if a condition is found that "...is of a type and condition that is not in compliance with applicable laws, regulations, and standards, or if it poses a threat to human health at the time of transfer of the property", then the ACM will be remedied under negotiated terms of the transfer document.</p> <p>The following sentence was added to the beginning of Section 8.0:<br/>         "The restrictions listed below will be included in the deed."</p> <p>No changes were made to the FOST per this comment. The structures listed in this section do not require occupancy restrictions because they are not buildings that can be entered (i.e. occupied). These structures are transformer pads, wind direction indicators, sanitary sewer, tennis court, basketball court, etc.</p> <p>Section 8.6.2.2 was revised to be consistent with the changes made per this comment.</p> |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|     | SPECIFIC COMMENTS   | RESPONSES   |
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| 30. | <p>Section 8.7 - Notifications and Restrictions - Lead-Based Paint, Pages 23-28</p> <p>Based on the age (pre-1978) of buildings and structures identified in Section 8.7.1, the DON maintains that LBP may be present on the exterior painted surfaces and may be present in the surrounding environment. (Note: There are also three structures and a building [6798, 6168, 6480 and 3002T] where the dates of construction are unknown and the possibility exists that LBP may be present on the exterior painted surfaces and may be present in the surrounding environment.) However, Section 8.7 seems to assert that DON does not intend to evaluate or abate LBP associated with these buildings and structures, now or in the future. The DON maintains that Buildings 5, 23A, 23B, 23C, 23D, 23E, 23F, 132, 134, 172, 177, 182, 184, 213, 218, 303, 3002T and Structures 10M, 10P, 39, 162, 215, 236, 238, 239, 241, 6798, 6168, 6480 are non-residential buildings/structures and as such, DON is not responsible for evaluation or abatement of lead in soils surrounding these facilities.</p> <p>The United States Environmental Protection Agency (EPA) and DTSC consider the presence of exterior LBP that has been released to the soil, to pose a potential Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) release to the environment. DON is required to evaluate and address all releases of CERCLA hazardous substances at its facilities, and where property has been transferred under CERCLA 120(h)(3) the DON must covenant that it will perform any remedial action found to be necessary after the date of transfer. In addition, the "DoD Policy on Responsibility for Additional Environmental Cleanup after Transfer of Real Property" (DoD comeback policy) asserts that DoD will typically utilize the Local Redevelopment Authority's reuse plan as the basis for the land use assumptions that DoD will consider during a remedy selection process. Because of the age of the buildings/structures, a potential release to the environment of lead associated with exterior lead-based paint exists, DON should conduct soil sampling to determine whether soils surrounding the above buildings/structures contain lead from LBP at levels which may pose a threat to human health and the environment.</p> <p>DTSC understands that the DON looks to Title X, the Residential Lead-Based Paint Hazard Reduction Act and the joint DoD/U.S. EPA interim final "Lead-Based Paint Guidelines for Disposal of Department of Defense Residential Real Property - A Field Guide" (December 1999) to address the hazards posed by LBP. DTSC however, has not adopted the joint DoD/U.S. EPA guidelines and its criteria for evaluating LBP hazards. DTSC maintains that lead from LBP is a CERCLA release. Therefore, without site-specific data, DTSC is unable to determine whether, pursuant to CERCLA 120(h)(3), all remedial actions have been taken at Parcels 1,16, 23, 27, 28, 29, 34, 35, and 40 with respect to potential releases of lead from LBP.</p> | <p>DON recognizes that U.S. EPA and DTSC consider the presence of exterior LBP that has been released to the soil to pose a potential CERCLA release to the environment. However, the U.S. EPA and DoD previously "agreed to disagree" on the question of natural weathering being a release of a CERCLA hazardous substance during negotiations for the joint U.S. EPA/DoD Field Guide. DoD deliberately avoided expressly endorsing or agreeing with the U.S. EPA's position in the Field Guide. The Field Guide also states that, "although EPA concluded that the release of lead to soil from lead-based paint from structures falls within the CERCLA definition of a hazardous substances release, EPA and DoD agree that for the majority of situations involving target housing (and child-occupied facilities), Title X is sufficiently protective to address hazards posed by lead-based paint.</p> <p>The CERCLA liability to evaluate and abate any LBP release/hazards does not apply to DON since DON does not consider the release of LBP by weathering a CERCLA release. The CERCLA warranty for LBP cleanup costs after transfer is not applicable based in the DON's position for releases of LBP through weathering. Any evaluation and abatement of soil-lead hazards at MCAS Tustin for nonresidential buildings and structures will be the responsibility of the future transferee unless DoD policy or generally applicable standards for nonresidential buildings/structures are promulgated after transfer.</p> <p>The Navy understands this is an "Unresolved Comment" and it will be attached to this FOST per the BRIM guidelines.</p> |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|                | SPECIFIC COMMENTS   | RESPONSES  |
|----------------|---|--|
| 30.<br>(cont.) | <p>Pages 23-24, Residential Buildings and Nonresidential Buildings: Anywhere there is a discussion regarding the requirements placed on the transferee for demolition of buildings/ structures or for interim use of buildings/ structures, it should also state that these requirements/ restrictions will be included in the transfer document (i.e., deed). Please include the information requested.</p> <p>Page 24, Residential Buildings, Line 3: Please change to read, "accordance with local, state, and federal requirements."</p> <p>Page 24, Nonresidential Buildings: As discussed for the residential buildings, there should be a general discussion for nonresidential buildings regarding restrictions, and that any restrictions will be included in the transfer document (i.e., deed). Please include the information requested.</p> <p>Page 24, Nonresidential Buildings, Paragraph 2, Line 2: Please change to read, "local, state, and federal requirements. Non-residential buildings scheduled for."</p> | <p>The following sentence was added to the beginning of Section 8.0:<br/> "All the following restrictions listed in this section will be incorporated into the deed(s)."</p> <p>The referenced sentence was revised to incorporate this comment.</p> <p>The following sentence was added to the beginning of Section 8.0:<br/> "All the following restrictions listed in this section will be incorporated in the deed(s)."</p> <p>The referenced sentence was revised to incorporate this comment.</p>  |
| 31.            | <p>Section 8.7.1 - Notifications - Lead-Based Paint, Pages 24-27</p> <p>In this section, please make a notification that three structures (6798, 6168, 6480) and a building (3002T) where the dates of construction are unknown and the possibility exists that LBP may be present.</p> <p>Paragraph 1, Line 1: Please change "parcel" to "parcels."</p> <p>Paragraph 2: Please revise the text from "housing units" to "residential buildings." Then, ensure that the number of buildings is correct.</p> <p>Finally, please ensure that the text is consistent with Sections 2.10, 8.7.2.1 and Table 1.</p> <p>Paragraph 2, Sentence 2: Please change to read, "All lead samples collected were at or below 103 milligrams per kilogram."</p> <p>Paragraph 3, Sentence 1: Please change to read, "There are a total of 61 non-residential buildings/ structures located within the transfer property."</p> <p>"Building 241" is incorrectly listed. It should be "Structure 241." Please make the correction.</p>               | <p>LBP notifications for Structures 6798, 6168, 6480, 6877, and 6878, and Building 3002T were added to Section 8.7.1 of the text.</p> <p>The referenced sentence was revised to incorporate this comment.</p> <p>The text was revised throughout the FOST to incorporate this comment.</p> <p>The text and table are consistent.</p> <p>The referenced sentence was revised to incorporate this comment.</p> <p>The referenced sentence was changed to be consistent with the revised FOST and is as follows:<br/> "There are a total of 60 non-residential buildings located within the transfer property."</p> <p>All references in the FOST to Building 241 were revised to indicate Structure 241.</p> |
| 32.            | <p>Section 8.7.2.1 - Residential Buildings, Page 27</p> <p>Moffett Meadows Housing Area: Please revise the text from "housing units" to "residential buildings."</p> <p>Please change "applicable laws and" to "local, state, and federal requirements."</p>  | <p>The text was revised throughout the FOST to incorporate this comment.</p> <p>The referenced sentence was revised to incorporate this comment.</p>   |

Response to Comments (continued)  
Finding of Suitability to Transfer  
Marine Corps Air Station Tustin, California

|     | SPECIFIC COMMENTS  | RESPONSES   |
|-----|--|---|
| 33. | <p>Section 8.7.2.2 - Nonresidential Buildings/Structures, Pages 27-28</p> <p>Although DTSC will not be concurring on the parcels associated with the buildings/structures in this section (see specific comment #30 above), we have the following comments:</p> <p>This section should appropriately address the three structures (6798, 6168, 6480) and building (3002T) where the dates of construction are unknown.</p> <p>Paragraph 1: Please change to read, "Buildings 5, 23A through F, 172, 182, and 303 - Since these buildings were constructed prior to 1978 (when LBP was potentially used), the transfer document will restrict the transferee from using the buildings. The buildings have a proposed disposition of 'to be determined' or demolition. If the buildings are slated for demolition or later become identified as 'to be demolished', the transfer document will require the transferee to demolish the buildings in accordance with local, state and federal requirements and conduct post-demolition soil sampling and abatement of any soil-lead hazards prior to occupation of any newly constructed buildings."</p> <p>Paragraph 2: Buildings 132, 177 and 213 should be removed and placed in a new paragraph. The new text for these buildings should read, "The proposed disposition of these buildings is reuse. Since these buildings were constructed prior to 1978 (when LBP was potentially used) and since LBP hazards were identified during the 1996 surveys, the transfer document will restrict the transferee from using the buildings until the necessary LBP surveys and abatement is conducted in accordance with all local, state and federal requirements."</p> <p>Paragraph 2: Please change to read, "Buildings 134, 184, and 218 - The proposed disposition of these buildings is reuse. Since these buildings were constructed prior to 1978 (when LBP was potentially used), the transfer document will restrict the transferee from using the buildings until the necessary LBP surveys and abatement is conducted in accordance with all local, state and federal requirements." (Building 241 was deleted from this paragraph because it was misidentified. 241 is actually a structure.)</p> <p>Paragraph 3: Please include Structure 241 here. These structures were constructed pre-1978 and no LBP surveys have been performed.</p> <p>Without any further information regarding the specifics for each structure, DTSC cannot agree that "no restrictions are required based on LBP."</p> | <p>This section was revised to address Structures 6798, 6168, 6480, 6877, and 6878, and Building 3002T.</p> <p>DTSC's comment is respectfully acknowledged, but no changes were made to the FOST per this comment.</p> <p>DTSC's comment is respectfully acknowledged, but no changes were made to the FOST per this comment.</p> <p>DTSC's comment is respectfully acknowledged, but no changes were made to the FOST per this comment.</p> <p>Structures 241, 6168, 6480, 6798, 6877, and 6878 were added to this section.</p> <p>DTSC's comment is acknowledged.</p> |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|     | SPECIFIC COMMENTS   | RESPONSES   |
|-----|---|---|
| 34. | <p>Section 8.8 - Notification - School Site Considerations, Page 28</p> <p>Please refer to specific comment #5 above.</p> <p>Parcel 17 is also designated for educational use (high school) and should be included in this section. Please revise the text accordingly.</p> <p>Lines 8 and 11: Please change "material" to "materials."</p> <p>Lines 16 and 17: Please change to read, "and lead-based paint at concentrations that fall outside the scope of CERCLA."</p> <p>Please ensure that any other parcels that are designated in the Reuse Plan for Tustin for a future school site, are included in this section.</p> | <p>The Reuse Plan does not provide more detail regarding "educational use".</p> <p>The referenced sentence was revised and is as follows:<br/> "Parcels 1 and 17 have been proposed in the Reuse Plan for educational/recreational use after transfer."</p> <p>The referenced sentences were revised to incorporate this comment.</p> <p>The referenced sentence was revised to incorporate this comment.</p> <p>Parcels 1 and 17 are included in this section.</p> |
| 35. | <p>Section 8.9 - Covenant - Additional Remedial Action, Page 28</p> <p>The CERCLA section cited is incorrect. The correct section is 120(h)(3)(A)(ii)(II). Please make the correction.</p> <p>As currently written, the covenant only applies to Parcels 1, 16, 23, 27, 28, 29, 34, 35, and 40. It excludes Parcels 17, 24, 36, 41. The covenant should apply to all transferring parcels. Please make the correction.</p>  | <p>The referenced sentence was revised to incorporate this comment. include all parcels.</p> <p>The referenced sentence was revised and is as follows:<br/> "This covenant will apply to Parcels 23, 29, 34, 35, and 36, and portions of 1, 16, 17, 24, 27, 28, 40, and 41 (see Hazardous Substance Notification Table in Attachment 3)."</p>   |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|     | SPECIFIC COMMENTS   | RESPONSES   |
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| 36. | <p>Section 9.0 - Finding of Suitability, Page 29</p> <p>According to DoD policy (Finding of Suitability to Transfer for BRAC Property, Memorandum dated 1 June 1994), "After completion and review of the EBS, the intended use analysis, and any available local community reuse plan, the DoD Component will sign a FOST once a determination has been made that the property is suitable for transfer by deed for the intended purpose, if known, because the requirements of CERCLA Section 120(h)(3) have been met for the property, taking into account the potential risk of future liability. The DoD Component will provide a copy of the signed FOST to the regulator . . ."</p> <p>Based on the DoD policy listed above, please change paragraph 2, line 5 to read, "the intended purpose, subject to the notifications and restrictions set forth."</p> <p>If the Reuse Plan for Tustin designates Parcel 1 for a school site(s), meaning kindergarten through grade 12 (i.e., elementary, middle, or high school), DTSC does not concur with DON's finding that Parcel 1 is suitable for transfer for the intended purpose. Additionally, DTSC does not concur with DON's finding that Parcel 17 is suitable for transfer for the intended purpose. Pursuant to the California Education Code, Section 17210 et. seq., a separate and comprehensive environmental review is required for future school sites. Because this separate environmental review has not been conducted for Parcels 1 and 17, DTSC is unable to concur that these parcels are suitable for school sites.</p> <p>In addition, DTSC does not concur with DON's finding that Parcels 1, 16, 23, 27, 28, 29, 34, 35, and 40 are suitable for transfer due to the potential release of lead from LBP to the soil. The soil surrounding the buildings/structures in the above parcels were not analyzed for the presence of lead.</p> <p>DTSC will reserve comment regarding the suitability of Parcels 36, 24, and 41 until we receive DON's responses to our comments on the draft FOST and have an opportunity to review the draft final version of the FOST.</p> | <p>The referenced sentence was revised to incorporate this comment.</p> <p>The Navy understands this is an "Unresolved Comment" and it will be attached to this FOST per the BRIM guidelines.</p> <p>The Navy understands this is an "Unresolved Comment" and it will be attached to this FOST per the BRIM guidelines.</p> <p>This response to comments and draft final FOST is submitted for DTSC review.</p> |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|     | SPECIFIC COMMENTS   | RESPONSES  |
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| 37. | <p>Table 1 - Buildings and Structures Within Transfer Parcels 23, 29, 34, 35, and 36, and Portions of 1, 16, 17, 24, 27, 28, 40 and 41</p> <p>Please revise the table so that anywhere it discusses "housing units" it is changed to "residential buildings". Then, ensure that the number of buildings is correct.</p> <p>Also, please revise the table to account for the residential buildings from Irvine Park South which are within Parcel 35.</p> <p>Finally, please ensure that the table is consistent with the text.</p> <p>Nine of the buildings/structures listed in column 1 are not included in Figure 3. Please include all nine buildings/structures in Figure 3.</p> <p>Page 2 of 3, Building 23E, Column 3: Please change "Ordinance" to "Ordnance".</p> <p>Page 3 of 3, Note b: It states that the ultimate parcel use is based on the Basewide EBS, Table 3-2. In comparing Table 3-2 (EBS) to Table 1 (FOST #3), a number of inconsistencies were found. The ultimate parcel use listed throughout this FOST should be consistent with the approved reuse plan for Tustin.</p> | <p>The table was revised throughout the FOST to incorporate this comment.</p> <p>The table was revised to state that Irvine Park South Housing is located in Parcels 35 and 36, and contains 79 multi-plex residential buildings (54 in Parcel 35 and 25 in Parcel 36).</p> <p>The text and table are consistent.</p> <p>The figure was revised to show all buildings/structures on Table 1 except for Structure 10P (a well casing) which could not be specifically located on the figure.</p> <p>The table was revised to incorporate this comment.</p> <p>Ultimate parcel uses in the FOST are designated as one of four categories: Educational/Recreational, Commercial/Business, Residential, or Circulation Facilities. These categories incorporate the more specific parcel uses as designated the Reuse Plan for Tustin.</p> |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|     | SPECIFIC COMMENTS   | RESPONSES   |
|-----|---|---|
| 38. | <p>Table 2 - Areas of Concern Within Parcels 23, 29, 34, 35, and 36, and Portions of 1, 16, 17, 24, 27, 28, 40, and 41</p> <p>Page 1 of 17, MAW-05: In the description, please explain why the well was removed from consideration by the BCT (i.e., well owned by IRWD).</p> <p>Page 3 of 17, MFL-1A: Please provide, in Attachment 2, the closure report letter(s) from the RWQCB.</p> <p>Page 3 of 17, MMS-02 (A-F): The NFA concurrence letter provided in Attachment 2 is for MMS-02 and states nothing about (A-F). Why the discrepancy?</p> <p>Page 6 of 17, ST-68 (A-C): The NFA concurrence letter provided in Attachment 2 is for ST-68 and ST-68A and states nothing about ST-68B and ST-68C. Why the discrepancy?</p> <p>Page 7 of 17, TOW-04: Why is there no BCT concurrence letter for NFA in Attachment 2? The only letter in Attachment 2 is from the County of Orange Health Care Agency.</p> <p>Page 7 of 17, AMS-02A: The NFA concurrence letter provided in Attachment 2 is for AMS-02, not AMS-02A. Why the discrepancy?</p> <p>Page 8 of 17, ST-16A: See general comment #1 above.</p> <p>Page 9 of 17, ST-16B: See general comment #1 above.</p> <p>Page 12 of 17, STD-03A (formerly ST-57A): The NFA concurrence letter provided in Attachment 2 is for STD-03. Why the discrepancy?</p> <p>Page 13 of 17, STD-03B (formerly ST-57B): The NFA concurrence letter provided in Attachment 2 is for STD-03. Why the discrepancy?</p> <p>Page 14 of 17, OCY-01: Please see general comment #4 above.</p> <p>Page 17 of 17, Acronyms/ Abbreviations: Please include "AMBP" and "MFL".</p> | <p>MAWs are miscellaneous abandoned wells. However, MAW-05 is an active well owned by IRWD, thus it should not be an AOC. As shown on Table 2, the BCT concurred with the recommendation to remove the AOC-MAW-05 on 7/12/01.</p> <p>The CO areas were revised. MFL-1A was removed from the FOST, it is included in CO-11.</p> <p>MMS-02 is comprised of MMS-02A, B, C, D, E, and F which were incorporated in the boundaries of IRP-7.</p> <p>In 1996, ST-68 was comprised of what is now referred to as ST-68A, B, and C and ST-68A was comprised of what is now called ST-68D, E, and F. The concurrence letter is for the original nomenclature.</p> <p>TOW-04 is also referred to as Oil/Water Separator 172C. Orange County Health Care Agency closed out Oil/Water Separators unless contamination was found. If contamination was found, it was turned over to RWQCB. For TOW-04 (O/W SEP 172C) there was no contamination, therefore it was closed out by Orange County.</p> <p>AMS-02 is comprised of AMS-02A and AMS-02B.</p> <p>The CO areas were revised. Site ST-16A was removed from the FOST and is included in CO-7.</p> <p>The CO areas were revised. Site ST-16A was removed from the FOST and is included in CO-7.</p> <p>The FOST was revised to reference STD-03A and STD-03B as one AOC - STD-03. STD-03 is comprised of STD-03A and STD-03B.</p> <p>The FOST was revised to reflect the NFA concurrence of OCY-01.</p> <p>AMBP (aerial photograph, miscellaneous, possible burn pit) was added to the list of acronyms.</p> |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|     | SPECIFIC COMMENTS  | RESPONSES  |
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| 39. | <p>Table 3 - Former UST/ AST Sites Within Transfer Parcels 23, 29, 34, 35, and 36, and Portions of 1, 16, 17, 24, 27, 28, 40 and 41</p> <p>Please refer to general comment #6 above.</p> <p>Page 1 of 4, UST-133: Please refer to specific comment #5 above.</p> <p>Page 2 of 4, UST-135: Please refer to general comment #2 above.</p> <p>Page 3 of 4, AST-194A and AST-194B: Please refer to general comment #2 above.</p> <p>Page 3 of 4, AST-540A and AST-540B: Why are these ASTs listed as Area Type 2 rather than Area Type 1?</p> <p>Page 3 of 4, Notes (a): Please delete Parcel 28. AST-540A and AST-540B were located on Parcel 28.</p> | <p>All the appropriate NFA concurrence letters are included in Attachment 2.</p> <p>UST 133 was redesignated as UST 133B (see discussion in Table 3). There is not an additional UST site. No revisions were made to the FOST per this comment except to add "(UST133B)" under "UST 133" in Table 3.</p> <p>The CO areas were revised. Site UST-135 was removed from the FOST and is included in CO-5.</p> <p>The CO areas were revised. The areas affected by sites AST-194A and AST-194B were removed from the FOST and are included in CO-11.</p> <p>The FOST was revised to indicate that AST-540A and 540B are area type 1.</p> <p>Note a was revised and is as follows: "No AOCs are located within Parcels 17, 24, 36, or 41"</p> |
| 40. | <p>Table 5 - Environmental Factors Considered - Transfer Parcels 23, 29, 34, 35, and 36, and Portions of 1, 16, 17, 24, 27, 28, 40 and 41</p> <p>Attachment 3 contains a Hazardous Substances Notification Table and a Petroleum Products Notification Table. In Table 5, please change the "No" to "Yes" for these two environmental factors.</p> <p>If a notification is made for USTs/ ASTs, as requested in specific comment #21 above, please change the "No" to "Yes" for the "Storage tanks" environmental factor.</p>  | <p>Table 5 was revised to incorporate this comment.</p> <p>A notification is not made for USTs/ ASTs in this FOST, therefore, Table 5 was not revised to incorporate this comment.</p>   |
| 41. | <p>Table 6 - Summary of PCB Transformer Survey and PCB Equipment Inspection Results In Buildings Within Transfer Parcels 23, 29, 34, 35, and 36, and Portions of 1, 16, 17, 24, 27, 28, 40 and 41</p> <p>B218: It states that a small capacitor was found but no action was required. Please see specific comment #23 above.</p>   | <p>Corrective action was not conducted because observation and/or sampling were not possible without dismantling the motor and destroying the capacitor.</p>   |

Response to Comments (continued)  
Finding of Suitability to Transfer  
Marine Corps Air Station Tustin, California

|     | SPECIFIC COMMENTS  | RESPONSES   |
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| 42. | <p>Table 8 - Monitoring Wells and Surface Water Gauging Locations Within Transfer Parcels 23, 29, 34, 35, and 36, and Portions of 1, 16, 17, 24, 27, 28, 40 and 41</p> <p>BMW06S is listed in this table and Table 9 as a surface water gauging station/location. However, in Figure 7, BMW06S is shown as a monitoring well. Please correct the inconsistency.</p> <p>The Draft 2000 Annual Groundwater Monitoring Report (GW Monitoring Report) is referenced, however, the document is final and the final should be referenced here. Please also verify that the monitoring frequencies listed in this table are consistent with the final GW Monitoring Report.</p> | <p>Tables 8 and 9 were revised to show that BMW06S is a monitoring well.</p> <p>The reference was changed to the Fall 2001 Quarterly Groundwater Monitoring Data Summary (BNI 2002). The monitoring (including water level measurements and sampling) frequencies listed in Table 8 are consistent with the Fall 2001 report.</p>   |
| 43. | <p>Table 9 - Notifications and Restrictions Summary for Transfer Parcels 23, 29, 34, 35, and 36, and Portions of 1, 16, 17, 24, 27, 28, 40, and 41</p> <p>Please ensure that this table is appropriately revised based on comments provided by DTSC in this letter.</p>  | <p>Table 9 was revised to incorporate revisions to the FOST.</p>  |
| 44. | <p>Figure 2 - Transfer Property Location Map</p> <p>There are four CO Areas associated with FOST #2. Please include the CO Areas for FOST #2 on the figure.</p>  | <p>Figure 2 was revised to show CO-1, CO-2, CO-3, and CO-4.</p>   |
| 45. | <p>Figure 3 - Buildings and Structures Within Transfer Parcels 23, 29, 34, 35, and 36, and Portions of 1, 16, 17, 24, 27, 28, 40, and 41</p> <p>Instead of including only one figure for all the buildings/structures in the transfer parcels (difficult to decipher, especially for Parcel 1), please provide enlargements of the various parcels containing figures/structures. For an example, please refer to FOST #2, Figures 3, 4, and 5.</p>  | <p>Three detailed figures were added to the FOST to help distinguish buildings/structures from other objects. Figures 4, 5, and 6 are detailed maps showing buildings and structures located within the northwestern (Parcel 23 and portions of 1, 16, 24, and 40), central (portions of Parcels 16, 17, 24, 27, and 40), and southeastern (Parcels 29, 34, 35, and 36, and portions of 28, 40, and 41) transfer parcels, respectively. On these figures, the buildings are shown in black, not grey.</p> |
| 46. | <p>Figure 5 - Former UST/AST Sites Within Transfer Parcels 23, 29, 34, 35, and 36, and Portions of 1, 16, 17, 24, 27, 28, 40, and 41</p> <p>See specific comment #5 above.</p>   | <p>Table 3 was revised to incorporate revisions to the FOST.</p>  |
| 47. | <p>Figure 6 - Installation Restoration Program Sites 1, 3, 5N, 5S(a), 11, 12, 13S, 13W, And 16</p> <p>Please include the other IRP sites that have received NFA (i.e., 2, 9A/B, and 13E).</p> <p>Are the plume configurations based on the most current information available? If not, please update.</p>  | <p>IRP-2, 9A, 9B, and 13E are included in the referenced figure.</p> <p>The plume configuration in the draft final FOST are based on the most current information available.</p>  |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|     | SPECIFIC COMMENTS   | RESPONSES   |
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| 48. | <p>Figure 7 - Monitoring Wells And Surface Water Gauging Locations Within Transfer Parcels 23, 29, 34, 35, And 36, And Portions Of 1, 16, 17, 24, 27, 28, 40, And 41</p> <p>In this figure, BMW06S is shown as a monitoring well. However, in Tables 8 and 9 BMW06S is listed as a surface water gauging station/location. Please correct the inconsistency.</p>  | The FOST was revised to show BMW06S as a monitoring well.   |
| 49. | <p>Figure 8 - Decision Tree For Asbestos-Containing Material Surveys</p> <p>This decision tree does not address the proposed disposition of "To be Determined." Why not? Please explain. It seems that in the text portion of this FOST, dealing with Asbestos-Containing Material, the proposed disposition of "To be Determined" is treated the same as the proposed disposition of "Demolition." Why are they treated the same? Please explain with regard to DoD policy.</p>  | In DON's efforts to best allocate federal funds, buildings with "to be determined" dispositions are treated the same as buildings slated for demolition. If these buildings are later designated for reuse, appropriate measures will be taken per the DOD policy.  |
| 50. | <p>Figure 9 - Contamination Base Map</p> <p>Are the plume configurations based on the most current available information? If not, please update.</p> <p>Referring to this figure as "Contamination Base Map" is misleading. It does show a lot of the contamination, but fails to show AOCs (except for the mingled plumes [various AOCs]), ASTs, or USTs (except for UST-222). At a minimum, please provide a note, in the figure, explaining that the figure does not include all contamination associated with each parcel.</p> <p>The NFA site labeled 13S is incorrect. It should be 13E. Please make the correction.</p>  | <p>The plume configuration in the draft final FOST are based on the most current information available.</p> <p>The text and figure were revised to include the following:<br/> "Figure 12 shows areas of contamination associated with each parcel. Figure 12 does not show contamination associated with each individual AOC, UST, or AST."</p> <p>The figures were revised to incorporate this comment.</p>   |
| 51. | <p>Attachment 1 - References</p> <p>Page 1: The Final Basewide EBS is incorrectly referenced as January. The date should be March. Please make the correction.</p> <p>Page 1: The Draft 2000 Annual Groundwater Monitoring Report (GW Monitoring Report) is referenced, however, the document is final and the final should be referenced here. Please correct.</p> <p>Pages 1-3: There are a few references listed in the Attachment that don't appear to have been used in the FOST (i.e., FEMA; JEG; and Memorandum of Agreement Among the Department of the Navy, California State Historic Preservation Office, and the Advisory Council on Historic Preservation for the Disposal and Reuse of MCAS Tustin). If these references were not used in the document, please delete from the Attachment.</p> <p>Page 4: The date for the National Environmental Protection Act (NEPA) ROD and FOSL 2 should be updated.</p> | <p>The reference was revised to incorporate this comment.</p> <p>This reference was removed and replaced with the Fall 2001 Quarterly Groundwater Monitoring Data Summary (February 2002).</p> <p>No changes were made to the attachment per this comment.</p> <p>The reference was revised to incorporate this comment.</p> <p>FOSL 2 is not referenced, FOSL 3 is referenced, but a date will not be available until the FOST and FOSL are finalized.</p> |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|     | SPECIFIC COMMENTS   | RESPONSES  |
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| 52. | Attachment 2 - No Further Action Regulatory Concurrence Letters For AOCs, USTs, And ASTs Within Transfer Parcels 23, 29, 34, 35, And 36, And Portions Of 1, 16, 17, 24, 27, 28, 40, And 41<br><br>EPA letter dated September 28, 2000 - Please make a note on the letter regarding the IRP and/or AOC sites that are applicable to this FOST. | The following note was added to the referenced NFA letter to incorporate this comment:<br>"Applies to IRP-2, IRP-9A, IRP-9B, IRP-13E, and AOCs AD-04, AS-6, AS-08, AST-02, AST-04, MDA-04, MDA-07, MMS-01, MWA-3." |
| 53. | Attachment 3 - Hazardous Substances Notification Table<br><br>Please revise Attachment #3 based on general comment #1 above.  | Attachment 3 was revised to incorporate revisions to the FOST.   |
| 54. | Attachment 3 - Petroleum Products Notification Table<br><br>Please revise Attachment #3 based on general comments #1 and 2 above.   | Attachment 3 was revised to incorporate revisions to the FOST.   |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

09 April 2002 Comments to Draft Final FOST from: Mr. Dana Ogden, City of Tustin

|    | COMMENTS  | RESPONSES   |
|----|---|---|
| 1. | The document should include a copy of the Navy's formal response to all comments on the Draft FOST, including the City of Tustin's comments dated February 5, 2002. Currently, the document only includes responses to comments made by the Department of Toxic Substances Control.   | The final FOST includes formal response to all comments (including the City of Tustin's 05 February 2002 comments) in Attachment 5.   |
| 2. | Figure 2 and 4 - It is noted, "all [Carve-Out Area] locations are approximate." For clarification, Carve-Out #5 does not include the portion of Parcel 40 located immediately adjacent to Red Hill avenue at Parcel 20.   | All figures were revised to incorporate this comment.   |
| 3. | It is essential that all FOST 3 discussions regarding Carve-Outs within FOST #3 be consistent with the recently completed Draft FOST #3.  | Carve-Out areas are consistent between the final FOST 3 and final FOST 3 documents.   |
| 4. | See City of Tustin 05 February 2002 Comment #2. This is an unresolved comment previously made on the Draft FOST #3.   | See response to City of Tustin 05 February 2002 Comment #2.   |
| 5. | See City of Tustin 05 February 2002 Comment #3. This is an unresolved comment previously made on the Draft FOST #3.   | See response to City of Tustin 05 February 2002 Comment #3.   |
| 6. | See City of Tustin 05 February 2002 Comment #4. This is an unresolved comment previously made on the Draft FOST #3.   | See response to City of Tustin 05 February 2002 Comment #4.   |
| 7. | See City of Tustin 05 February 2002 Comment #5. This is an unresolved comment previously made on the Draft FOST #3.   | See response to City of Tustin 05 February 2002 Comment #5.   |
| 8. | Page 15, Section 8.0 - In response to our previous comments, the FOST now indicates, "additional environmental factors associated with parcels being transferred for ultimate use as a school site were considered." The previous draft indicated, "additional scrutiny was given to the environmental factors associated with parcels being transferred for ultimate use as a school site." Although the words are different, the City of Tustin (or any other reader of the document) still does not know what "additional scrutiny" was considered or what the Navy actually did in this regard. Please include a summary in the document as to what factors were considered as satisfactory "scrutiny" by the Navy. DTSC should also concur with these conclusions. This is an unresolved comment previously made on the Draft FOST #3. | As explained in Section 8.0, a variety of environmental factors were evaluated to determine the necessary notifications and restrictions for the transfer property. Some of these environmental factors include the potential release of hazardous substances related to AOCs/USTs/ASTs/IRPs, the potential presence of ACM, LBP, PCBs, or radon, and the existence of wetlands or prime farmland. In addition to an evaluation of environmental factors (as listed above), additional consideration was given to parcels being transferred for ultimate use as a school site. As a result of this consideration, Section 8.9, Notification - School Site Considerations was included in the FOST. Section 8.9 lists the parcels that are proposed for reuse as a school site and describes the requirements for the property associated with that. The transferee will be required to conduct a separate environmental review (in accordance with CEC Section 17210 et. seq.) for these sites subject to approval by DTSC. |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|     | COMMENTS  | RESPONSES  |
|-----|---|--|
| 9.  | Page 15, Section 8.1 - The Section discusses a 1996 sampling of soils for pesticides and metals. The City has previously requested that the Navy confirm that the DTSC's 1992 concurrence on risk for Parcels 38/39 also applies to Parcel 24. In an apparent response, the Navy has deleted the reference to the DTSC concurrence on the PEA (pesticides) report. Does this mean that DTSC did not concur with the risk assessment? Should they have? The Navy should clearly address and respond to this issue. The City of Tustin will not assume any liability or responsibility for remediation of pesticide contamination contributed to the site prior to City of Tustin ownership. The DTSC should also concur with the Navy's stated position on this issue. This is an unresolved comment previously made on the Draft FOST #3.   | DON did not delete reference to DTSC's concurrence to the 1992 PEA report. The last two sentences of the third paragraph in Section 8.1 are as follows:<br>"DTSC provided NFA concurrence on the findings in the PEA for the area containing Parcel 24. DTSC's 27 May 1992 NFA concurrence letter is provided in Attachment 2."<br>The following sentence is also included in Section 8.1, paragraph 6, and the referenced letter is included in Attachment 2:<br>"The 1996 Pesticides Investigation Report was reviewed by the BCT whose comments were incorporated (see 15 July 1996 letter in Attachment 2)."<br>Further, specific issues of liability will be negotiated in the deed(s). |
| 10. | Page 17, Section 8.2 - The document discusses PCB contamination concentrations as "classified by federal standards." In commenting on the Draft FOST #3, the City of Tustin requested that the narrative in this section be revised to identify the Cal EPA maximum for PCBs and that the section clearly state that this standard has been met prior to transfer of the property. The section does not include the requested clarifying language. What is the California standard on PCBs? DTSC should also concur with the Navy's stated position on this issue. This is an unresolved comment previously made on the Draft FOST #3.  | See response to City of Tustin 05 February 2002 Comment #9.<br>In addition to the federal standards for PCBs, Cal-EPA has a 5 ppm or greater hazardous waste characterization standard for PCBs. However, this is only applicable for disposal purposes once PCBs are removed from service. It does not apply to PCBs still in service. The following sentence is included in Section 8.2:<br>"PCB-containing equipment may also be subject to State hazardous waste laws regulating PCB waste."   |
| 11. | See City of Tustin 05 February 2002 Comment #10. This is an unresolved comment previously made on the Draft FOST #3.  | See response to City of Tustin 05 February 2002 Comment #10.   |
| 12. | Page 19, Section 8.6 - The section states that the DON is required to conduct an Asbestos (ACM) survey "only when the Reuse Plan calls for a building/structure to be reused or occupied." The Navy has mistakenly assumed that non-residential buildings identified in the approved Reuse Plan as "To Be Determined (TBD)" are not planned for reuse. This conclusion has precluded Navy completion of required ACM surveys for such buildings at the sole benefit of the Navy and detriment of the community. Friable ACM constitutes a release of a hazardous substance. As such, it is the obligation of the Navy to provide the CERCLA warranty that all actions necessary to protect human health and the environment have been taken and that the property is suitable for reuse (including TBD buildings) for the purposes identified in the approved Reuse Plan for MCAS Tustin. If these TBD buildings have not been tested and the City does not plan to demolish them, how can it be determined that the property has met the standard for transfer? DTSC should also concur with the Navy's stated position on this issue. This is an unresolved comment previously made on the Draft FOST #3. | For buildings/structures with a TBD disposition, the transferee assumes responsibility for the management of ACM, including the surveys, removal and/or management of ACM prior to or during <u>demolition</u> , in accordance with all applicable local, state, and federal laws, <u>AND</u> if the transferee chooses to <u>occupy</u> the buildings on an interim basis, the transferee assumes responsibility for the management of ACM in accordance with applicable laws prior to occupancy or renovation.   |
| 13. | See City of Tustin 05 February 2002 Comment #13. This is an unresolved comment previously made on the Draft FOST #3.  | See response to City of Tustin 05 February 2002 Comment #13.   |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|     | COMMENTS   | RESPONSES  |
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| 14. | Page 25, Section 8.6.2.2 – Building 213 is identified for immediate reuse within the Reuse Plan for MCAS Tustin. Section 8.6 states: “DON is required to conduct a FAD ACM survey only when the reuse plan calls for a building/structure to be reused or occupied, rather than demolished.” How is it then permissible for the Navy to state in this section “abatement of this building [213] will be negotiated with the transferee as a requirement of property transfer”? How can the Navy and DTSC conclude that the building 213 property is “suitable for transfer” when the requirement of ACM remediation has not been completed? In addition, no clarification is provided as to what the Navy is contemplating for discussion in the negotiation? Without determining who does what/when, establishing future liability and responsibility, how can a suitability determination be made? For the buildings listed in the 4 <sup>th</sup> paragraph (buildings 245, 246, 249, 524, 526, 538, 549, and 561), same issue. DTSC should also concur with the Navy’s stated position on this issue.              | DON is currently abating the detected FAD ACM at Building 213. Abatement will be completed before property transfer.<br><br>The FOST was revised to indicate that Building 213 does not contain FAD ACM and therefore has no restrictions for occupancy due to ACM.  |
| 15. | See City of Tustin 05 February 2002 Comment #14. This is an unresolved comment previously made on the Draft FOST #3.   | See response to City of Tustin 05 February 2002 Comment #14.   |
| 16. | This section states that Parcel 1 and 18 have been proposed for educational reuse. Parcels 16, 24, 27, and 28 also permit educational reuse. Please correct. This is an unresolved comment previously made on the Draft FOST #3.   | The FOST was revised to include the following as fourth paragraph of Section 1.0:<br>“Ultimate parcel uses in the FOST are designated as one of four categories: Educational/Recreational, Commercial/Business, Residential, or Circulation Facilities. These categories incorporate the more specific parcel uses as designated in the Reuse Plan for Tustin.”<br><br>The FOST is consistent with the Reuse Plan. Figure 2 of the Reuse Plan designates Parcel 16 as the Community Core, which falls under the heading “Commercial/Business”, Parcel 24 is designated as Medium Density Residential, which falls under the heading “Residential”, and Parcels 27 and 28 are designated as the Golf Village, which falls under the heading “Residential”. Further, the FOST references the Reuse Plan and indicates that further detail, including narrative descriptions of reuse, can be found directly in the Reuse Plan. |
| 17. | Page 32, Section 8.10 – The City of Tustin had provided comments on the Draft FOST #3 that indicated that the section describes a covenant that will be placed upon certain Parcels ensuring additional remedial action in the event that hazardous substances are later found at those sites. The City requested that the Navy provide additional language in the section that explains why the deeds of certain Parcels (17, 24, 36, and 41) will not include this covenant. The Section’s language continues to be unacceptable to the extent that it invalidates the covenant based on acts or omissions of the transferee. If the transferee were to hit a buried tank that no one knew about that was left behind by the Navy, the resulting release is based on our act, but we were not negligent, as the Navy failed to give adequate notice of the hazard. Yet as the section is currently written, the Navy would not have to honor the covenant. Please revise. DTSC should also concur with the Navy’s stated position on this issue. This is an unresolved comment previously made on the Draft FOST #3, | See response to City of Tustin 05 February 2002 Comments #17 and #18.  |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

05 February 2002 Comments to Draft FOST from: Mr. Dana Ogden, City of Tustin

|    | COMMENTS   | RESPONSES  |
|----|--|--|
| 1. | <p>The FOST boundaries depicted in Figure 2 appear to predispose the Navy's selection of a passive alternative remedial action for Operable Unit (OU)-4 (assumed to be natural attenuation). If left unaltered, this pre-decision would allow an existing groundwater plume to migrate into a portion of the base that is critically needed to support economic redevelopment and job creation. Should the Navy allow this unnecessary migration to occur, the community's efforts to implement rapid economic recovery at MCAS Tustin could be seriously harmed. The City requests that the Navy proactively identify and select remedial alternatives for OU-4 that would minimize the use of land use restrictions and covenants, maximizing the potential to generate jobs and long-term economic development opportunities within the potentially affected Community Core. The City requests that the Navy reduce the carve-out area identified in Figure 2 to accommodate a more aggressive remediation of OU-4 to minimize the long-term economic impacts to the Community Core and maximize future civilian reutilization of the MCAS Tustin property.</p> | <p>The purpose of the CO areas is to allow for the protection of human health and the environment during ongoing cleanup and investigation activities. To ensure that the FOST includes only properties that do not require further cleanup or investigation, the CO areas were designed to encompass both the impacted areas and buffer zones. The ROD for OU-4 has not been finalized, therefore, the remedy, whether it be monitored natural attenuation or an active treatment remedy, has not been selected. The FOST must provide for protection of human health and the environment, regardless of which remedy is selected, therefore, conservative CO areas must be used.</p>   |
| 2. | <p>Page 4, Section 2.2 (Parcel 16) - the section incorrectly states that Parcel 16 is "to be transferred for commercial/business use." On March 2, 2001, the Navy published its Record of Decision (ROD) for the reuse and disposal of MCAS Tustin indicating its intention to dispose of MCAS Tustin property "in a manner that is consistent with the land uses identified in the LRA's Reuse Plan for the property." The narrative description in the Reuse Plan for MCAS Tustin identifies Parcel 16 as the "Community Core" land use designation that allows a variety of alternative uses including commercial business, public/institutional, and other uses. However, it is clear that commercial business uses are the primary focus of the majority of the land area. Please revise the current statement to recognize the full range of potential future uses at Parcel 16 (see Page 2-8 of the Reuse Plan for MCAS Tustin) as actually described in the Reuse Plan's land use description.</p>   | <p>The FOST was revised to include the following as fourth paragraph of Section 1.0:<br/> "Ultimate parcel uses in the FOST are designated as one of four categories: Educational/Recreational, Commercial/Business, Residential, or Circulation Facilities. These categories incorporate the more specific parcel uses as designated in the Reuse Plan for Tustin."</p> <p>The FOST is consistent with the Reuse Plan. Figure 2 of the Reuse Plan includes the Community Core under the heading "Commercial/Business". Further, the FOST references the Reuse Plan and indicates that further detail, including narrative descriptions of reuse, can be found directly in the Reuse Plan.</p>                                     |
| 3. | <p>Page 5, Section 2.5 - The section incorrectly states that Parcel 24 "is anticipated to be transferred for residential use." Please expand this description to also recognize that the narrative land use description in the Reuse Plan that allows the site be used for public/institutional, childcare facilities and other uses (Page 2-7 of the Reuse Pan for MCAS Tustin).</p>  | <p>The FOST was revised to include the following as fourth paragraph of Section 1.0:<br/> "Ultimate parcel uses in the FOST are designated as one of four categories: Educational/Recreational, Commercial/Business, Residential, or Circulation Facilities. These categories incorporate the more specific parcel uses as designated in the Reuse Plan for Tustin."</p> <p>The FOST is consistent with the Reuse Plan. Figure 2 of the Reuse Plan shows Parcel 24 as "Medium Density Residential" and includes this label under the heading "Residential". Further, the FOST references the Reuse Plan and indicates that further detail, including narrative descriptions of reuse, can be found directly in the Reuse Plan.</p> |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|    | COMMENTS   | RESPONSES   |
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| 4. | <p>Page 5, Section 2.6 – The section incorrectly states that Parcel 27 “is anticipated to be transferred for residential use.” Please expand this description to also recognize that the narrative land use description in the Reuse Plan that allows the site (Golf Village) to be used for golf course, hotel and/or timeshares, accessory retail, service commercial, restaurant uses, recreational uses, public/institutional facilities, child care facilities and other uses (Page 2-8 of the Reuse Plan for MCAS Tustin).</p> | <p>The FOST was revised to include the following as fourth paragraph of Section 1.0:<br/> “Ultimate parcel uses in the FOST are designated as one of four categories: Educational/Recreational, Commercial/Business, Residential, or Circulation Facilities. These categories incorporate the more specific parcel uses as designated in the Reuse Plan for Tustin.”</p> <p>The FOST is consistent with the Reuse Plan. Figure 2 of the Reuse Plan includes the Golf Village under the heading “Residential”. Further, the FOST references the Reuse Plan and indicates that further detail, including narrative descriptions of reuse, can be found directly in the Reuse Plan.</p>                    |
| 5. | <p>Page 6, Section 2.9 – The section incorrectly states that Parcel 28 is anticipated to be transferred for residential use.” Please expand this description to also recognize that the narrative land use description in the Reuse Plan that allows the site (Golf Village) to be used for golf course, hotel and/or timeshares, accessory retail, service commercial, restaurant uses, recreational uses, public/institutional facilities, child care facilities and other use (Page 2-8 of the Reuse Plan for MCAS Tustin).</p>   | <p>See response to Comment #4.</p>  |
| 6. | <p>Page 11, Section 7.0, second paragraph – The section incorrectly stated, “the Operations and Maintenance Plan is scheduled to be completed in 2001.” Please correct to read “2002.”</p>   | <p>The referenced sentence was revised to incorporate this comment.</p>   |
| 7. | <p>Page 13, Section 8.0 – The section states, “additional scrutiny was given to the environmental factors associated with parcels being transferred for ultimate use as a school site.” What additional scrutiny did this property receive?</p> <p>Please also state in the FOST why the Navy believes it has satisfied the requirements.</p>  | <p>The text was revised to be consistent with FOST 2. The referenced sentence is as follows:<br/> “In addition, the environmental factors associated with parcels being transferred for ultimate use as a school site were considered.”</p> <p>Section 8.9, Notification – School Site Considerations states “Should the subject parcel be considered for the proposed acquisition and/or construction of school properties utilizing state funding, a separate environmental review process in compliance with the California Education Code (CEC) section 17210 et. seq. will need to be conducted by the transferee and approved by the DTSC (School Property Evaluation and Cleanup Division).”</p> |
| 8. | <p>Page 14 and 15, Section 8.1 – The section discusses a 1996 sampling of soils for pesticides and metals. The section is confusing as written since it discusses general findings concerning a number of parcels at MCAS Tustin. Specifically, please identify the parcel(s) from which the 1996 samplings were taken. Please confirm that the DTSC’s 1992 concurrence on risk for Parcels 38/39 also applies to Parcel 24.</p>   | <p>The referenced section was revised and includes the following sentences:<br/> “Further investigation in 1996 supported the PEA findings. Soil samples were collected from the southwest corner (Parcel 6) and the northeast quadrant (Parcels 17, 25, 26, 27, 28, 29, 30, 31, 32, and 40) of MCAS Tustin to evaluate whether residual pesticides and metals were present in soil as a result of past agricultural activities at MCAS Tustin (BNI 1996b).”</p> <p>The 26 and 27 May 1992 NFA concurrence letters from DTSC for the PEA are provided in Attachment 2.</p>  |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|     | COMMENTS   | RESPONSES  |
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| 9.  | <p>Pages 15 and 16, Section 8.2 - The section states that in 1992, a small capacitor at Building 218 was found to potentially contain PCBs. MCAS Tustin officially closed in July 1999. Has the Navy confirmed recently that this capacitor is still in place?</p> <p>Also, the section states that transfer parcels "contained PCBs at concentrations equal to or less than 14 ppm" and require no additional action. It is our understanding that Cal EPA has established a maximum for PCB's at the 5 ppm level. Please confirm in the narrative that Cal EPA is satisfied with this level of PCBs being transferred with the property.</p> | <p>As described in the EBS, DON conducted two basewide PCBs surveys, one in 1992 and one in 1996. No additional PCB surveys have been conducted at the base. Since base closure, in 1999, the buildings have been vacant and DON assumes that the building condition regarding PCBs remains consistent with the past PCB survey findings.</p> <p>In addition to the federal standards for PCBs, Cal-EPA has a 5 ppm or greater hazardous waste characterization standard for PCBs. However, this is only applicable for disposal purposes once PCBs are removed from service. It does not apply to PCBs still in service.</p> <p>The referenced section was revised and includes the following:<br/>         "Transformers with PCB concentrations of less than 50 ppm are classified by federal standards (40 Code of Federal Regulations 761.3) as non-PCB transformers. PCB-containing equipment may also be subject to State hazardous waste laws regulating PCB waste. Transformers tested for PCBs during this study that are currently located within the boundaries of the transfer parcels all contained PCBs at concentrations equal to or less than 32 ppm. No additional action concerning transformers is required by DON before transfer."</p> |
| 10. | <p>Page 16, Section 8.4 - The section incorrectly states that wetlands have developed within some storm drainage channels at MCAS Tustin and that "the water source appears to be drainage from urban and agricultural runoff from both on-site and off-site sources." Urban and agricultural uses at the base ceased some time ago. Please correct the section by eliminating this statement. Wetlands that may exist at MCAS Tustin at the time that development occurs will be appropriately reviewed and permitted by the responsible state and federal agencies.</p>  | <p>The 2001 EBS for MCAS Tustin, page 4-4, in referring to Peters Canyon Channel and other smaller drainage ditches, states: "These earthen drainages support cattail and other common marsh plants. The water source appears to be urban and agricultural runoff from both on-base and off-base sources."</p> <p>No revisions to the FOST were made per this comment.</p>   |
| 11. | <p>Page 17, Section 8.5 - The section incorrectly omits Parcels 16 and 24 from the list of MCAS Tustin Parcels that contain prime farmland (according to the EIS/EIR for MCAS Tustin). Please correct.</p>   | <p>Parcels 16 and 24 were added to Section 8.5, Notification - Prime/Unique Farmland per this comment.</p>   |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|     | COMMENTS   | RESPONSES   |
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| 12. | <p>Page 17, Section 8.6 – The section states that the Asbestos Hazard Emergency Response Act (AHERA) requires re-inspection ‘of ACM at least once every three years’. The section indicates that inspections performed by the Navy in 1997 “are considered to be in compliance with this act” since base closure occurred in 1999. The City does not believe that this conclusion is supported in law and requests that the Navy update the required ACM inspections until disposal actually occurs.</p> <p>Also, the section states that the DON is required to conduct an Asbestos (ACM) survey “only when the Reuse Plan calls for a building/structure to be reused or occupied.” The Navy has mistakenly assumed that non-residential buildings identified in the approved Reuse Plan as “To Be Determined (TBD)” are not planned for reuse. This conclusion has precluded Navy completion of required ACM surveys for such buildings at the sole benefit of the Navy and detriment of the community. Friable ACM constitutes a release of a hazardous substance. As such, it is the obligation of the Navy to provide the CERCLA warranty that all actions necessary to protect human health and the environment have been taken and that the property is suitable for reuse (including TBD buildings) for the purposes identified in the approved Reuse Plan for MCAS Tustin.</p> | <p>Per DoD policy, as included in Attachment 4, compliance with AHERA is not a requirement. In a conservative approach, DON has followed AHERA’s recommendation to perform a survey once every 3 years for an active base. Since base closure in 1999, the buildings have been unoccupied and no reported water damage has occurred that may have altered the condition of ACM since the 1997 survey. Therefore, the results are considered to be valid.</p> <p>For buildings/structures with a TBD disposition, the transferee assumes responsibility for the management of ACM, including the surveys, removal and/or management of ACM prior to or during <u>demolition</u>, in accordance with all applicable local, state, and federal laws, <u>AND</u> if the transferee chooses to <u>occupy the buildings</u> on an interim basis, the transferee assumes responsibility for the management of ACM in accordance with applicable laws prior to occupancy or renovation.</p> |
| 13. | <p>Page 21, Section 8.6.2.1 – The section incorrectly states that Irvine Park South Housing units and the Tustin Villas Housing units “are not designated for reuse” and that the DON is not obligated to conduct any additional asbestos surveys. The Irvine Park South and Tustin Villas housing units are and have always been identified for potential reuse. In fact, the City’s Economic Development Conveyance (EDC) submittal and the Reuse Plan were clear about this. In addition, it is incorrectly presumptive of the Navy to state that certain buildings have not been designated for reuse when the Reuse Plan for MCSA Tustin clearly indicates future reuse as “to be determined.” Please correct these statements and incorrect assumptions and conclusions regarding the survey and treatment of asbestos for these buildings.</p>  | <p>The referenced sentence was revised and is as follows:<br/> “Nevertheless, since the buildings are slated for demolition, or have a disposition of ‘to be determined’, DON is not obligated to conduct any additional surveys.”</p> <p>The assumptions and conclusions regarding the survey and treatment of asbestos for these buildings remain unchanged. For buildings/structures with a TBD disposition, the transferee assumes responsibility for the management of ACM, including the surveys, removal and/or management of ACM prior to or during <u>demolition</u>, in accordance with all applicable local, state, and federal laws, <u>AND</u> if the transferee chooses to <u>occupy the buildings</u> on an interim basis, the transferee assumes responsibility for the management of ACM in accordance with applicable laws prior to occupancy or renovation.</p>  |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|     | COMMENTS   | RESPONSES   |
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| 14. | <p>Page 24, Section 8.7 - The purpose of the FOST is to determine whether the property is suitable for transfer for the purposes identified in the Reuse Plan. The section indicates that the DON "will not conduct sampling at non-residential buildings prior to transfer." The section also states, "evaluation and abatement of LBP at non-residential buildings will be the responsibility of the transferee." Lead-in-soil constitutes a release of a hazardous substance. As such, it is the obligation of the Navy to provide the CERCLA warranty that all action necessary to protect human health and the environment have been taken and that the property is suitable for reuse for the purposes identified in the approved Reuse Plan for MCAS Tustin. When a building with LBP is demolished by a civilian developer at a site where levels of military lead-in-soil previously exist (e.g., 375 ppm at the time of transfer and 425 ppm after civilian demolition), the developer should not be required to pay for the entire cost of any required remediation. It is difficult to understand how the CERCLA warranty can be provided without testing, remediation (if necessary), and certification by the Navy and regulatory that lead-in-soil threat does not exist in these non-residential areas. Please revise and provide regulatory concurrence for these future revisions.</p> | <p>DON recognizes that U.S. EPA and DTSC consider the presence of exterior LBP that has been released to the soil to pose a potential CERCLA release to the environment. However, the U.S. EPA and DoD previously "agreed to disagree" on the question of natural weathering being a release of a CERCLA hazardous substance during negotiations for the joint U.S. EPA/DoD Field Guide. DoD deliberately avoided expressly endorsing or agreeing with the U.S. EPA's position in the Field Guide. The Field Guide also states that, "although EPA concluded that the release of lead to soil from lead-based paint from structures falls within the CERCLA definition of a hazardous substances release, EPA and DoD agree that for the majority of situations involving target housing (and child-occupied facilities), Title X is sufficiently protective to address hazards posed by lead-based paint.</p> <p>The CERCLA liability to evaluate and abate any LBP release/hazards does not apply to DON since DON does not consider the release of LBP by weathering a CERCLA release. The CERCLA warranty for LBP cleanup costs after transfer is not applicable based in the DON's position for releases of LBP through weathering. Any evaluation and abatement of soil-lead hazards at MCAS Tustin for nonresidential buildings and structures will be the responsibility of the future transferee unless DoD policy or generally applicable standards for nonresidential buildings/structures are promulgated after transfer.</p> <p>The Navy understands this is an "Unresolved Comment" and it will be attached to this FOST per the BRIM guidelines.</p> |
| 15. | <p>Page 28, Section 8.8 - The section states that Parcel 1 has been proposed for educational reuse. As noted above, Parcels 16, 17, 24, 27, and 28 also permit educational reuse. Please correct.</p>  | <p>The referenced section was revised to include the following sentence:<br/> "Parcels 1 and 17 have been proposed in the Reuse Plan for educational/recreational use after transfer."</p> <p>The FOST was revised to include the following as fourth paragraph of Section 1.0:<br/> "Ultimate parcel uses in the FOST are designated as one of four categories:<br/> Educational/Recreational, Commercial/Business, Residential, or Circulation Facilities.<br/> These categories incorporate the more specific parcel uses as designated in the Reuse Plan for Tustin."</p> <p>The FOST is consistent with the Reuse Plan. Figure 2 of the Reuse Plan designates Parcel 16 as the Community Core, which falls under the heading "Commercial/Business", Parcel 24 is designated as Medium Density Residential, which falls under the heading "Residential", and Parcels 27 and 28 are designated as the Golf Village, which falls under the heading "Residential". Further, the FOST references the Reuse Plan and indicates that further detail, including narrative descriptions of reuse, can be found directly in the Reuse Plan.</p>  |
| 16. | <p>Page 28, Section 8.9 - The section describes a covenant that will be placed upon certain Parcels ensuring additional remedial action in the event that hazardous substances are later found at those sites. Please provide additional language in the section that explains why the deeds of certain Parcels (17, 24, 36, and 41) will not include this covenant.</p>   | <p>The referenced sentence was revised and is as follows:<br/> "This covenant will apply to Parcels 23, 29, 34, 35, and 36, and portions of 1, 16, 17, 24, 27, 28, 40, and 41 (see Hazardous Substance Notification Table in Attachment 3)."</p>  |

**Response to Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|     | COMMENTS  | RESPONSES  |
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| 17. | Page 29, Section 8.9 – The section's discussion of the Navy's intent to perform additional remediation of military contamination found later to exist at the site is not clear. This is especially true for the last sentence regarding acts or omissions of the transferee "that causes a new release of hazardous substances." If a transferee were to accidentally hit a previously unknown and buried 55-gallon drum of military hazardous materials, the transferee should not be liable for the release. Please modify the existing language to make this section more clear. | <p>The referenced section is clear:</p> <p>"This covenant will not apply to any remedial action required on the property that is a result of an act or omission of the transferee that causes a <u>new release</u> of hazardous substances."</p> <p>Further, specific issues of liability will be negotiated in the deed(s).</p> |
| 18. | Page 30, Section 8.10 – The section describes a deed "right of access" reservation that will be retained by the United States for Parcels 1, 27, 28, 29, 40, and 41 for access to groundwater monitoring wells located in those areas. Please add a statement to the section that clearly indicates that Parcels 16, 17, 24, 34, 35, and 36 will have no "access" reservation requirement.  | As stated in this section, Pursuant to CERCLA Section 120(h)(3)(A)(iii), the United States shall have access to <u>all</u> the FOST parcels in any case in which remedial or corrective action is found to be necessary on <u>any</u> of the FOST parcels. Therefore, all parcels will have access requirements.                 |

**ATTACHMENT 6**  
**UNRESOLVED COMMENTS**

Unresolved Comments  
Finding of Suitability to Transfer  
Marine Corps Air Station Tustin, California

|    | California Department of Toxic Substances Control (DTSC)  | United States Department of the Navy (DON)  |
|----|---|---|
| 1. | <p>DTSC is unable to concur with the suitability of Parcels 1 and 17 for transfer. The 1998 MCAS Tustin Specific Plan/Reuse Plan Errata identifies Parcels 1 and 17 as educational/recreational use. As a result, it is possible that the reuse of these parcels could include school sites, meaning kindergarten through grade 12 (elementary, middle, and high schools). Additional detail is not provided for Parcel 1 and the Base Realignment and Closure (BRAC) Business Plan 2002 (in review) designates the land use of Parcel 17 as a High School. Pursuant to the California Education Code, Section 17210 et seq., a separate and comprehensive environmental review is required for sites where state funds will be used for property acquisition or school construction. This law requires that DTSC make a determination as to the suitability of the property for school use based on this review. The review process includes an evaluation of whether hazardous materials on the property have been or could be released that would endanger students. Because this separate environmental review has not been conducted for Parcels 1 and 17, DTSC cannot determine if these parcels are suitable for the intended use.</p> | <p>Any requirements associated with the evaluation of the proposed school site for compliance with the CEC are the responsibility of the transferee, and not DON.</p> <p>The requirements of California Education Code 17210, et seq., (known as AB387 and SB 162) do not apply directly to the Navy in the planned transactions of Parcels 1 and 17. This State law requires that school districts that are recipients of State school bond funds for school site acquisition or school constructions conduct a specific environmental review and obtain a DTSC determination as to whether or not the property is suitable for school use. In the context of the Navy's pending conveyance of Parcels 1 and 17, it requires that the transferee of the parcels conduct these environmental reviews and obtain the DTSC determination. Nothing prohibits the transferees and DTSC from implementing these requirements after the transfer.</p> <p>Because the requirements of California Education Code 17210, et seq., are not promulgated requirements of general applicability and do not apply to the Navy, they are not legally binding upon the Navy's CERCLA determinations and the CERCLA covenant. Therefore, the conclusion reached in the FOST that Parcels 1 and 17 are "suitable to transfer" will remain the Navy's determination.</p> |

**Unresolved Comments (continued)**  
**Finding of Suitability to Transfer**  
**Marine Corps Air Station Tustin, California**

|    | California Department of Toxic Substances Control (DTSC)   | United States Department of the Navy (DON)  |
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| 2. | <p>DTSC is unable to concur with the suitability of Parcels 23, 29, 34, 35, and portions of Parcels 1, 16, 27, 28, and 40 for transfer. DTSC considers the presence of exterior Lead-Based Paint (LBP) that has been released to the soil, to pose a potential release to the environment pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986. The Department of the Navy (DON) is required to evaluate and address all releases of CERCLA hazardous substances at its facilities, and where property has been transferred under CERCLA 120(h)(3) the DON must covenant that it will perform any remedial action found to be necessary after the date of transfer. In addition, the "DoD [Department of Defense] Policy on Responsibility for Additional Environmental Cleanup after Transfer of Real Property" (DoD Come-back Policy) asserts that DoD will typically utilize the Local Redevelopment Authority's reuse plan as the basis for the land use assumptions that DoD will consider during a remedy selection process. Based upon the date of construction of various buildings/structures on these parcels, a potential release to the environment of lead associated with exterior LBP exists. As a result, the DON should conduct soil sampling to determine whether soils surrounding these buildings/structures contain lead from LBP which may pose a threat to human health or the environment.</p> <p>DTSC understands that the DON looks to Title X, the Residential Lead-Based Paint Hazard Reduction Act and the joint DoD/United States Environmental Protection Agency (EPA) Interim final "Lead-Based Paint Guidelines for Disposal of Department of Defense Residential Real Property - A Field Guide," dated December 1999, to address the hazards posed by LBP. DTSC however, has not adopted the joint DoD/U.S. EPA guidelines and its criteria for evaluating LBP hazards. DTSC maintains that lead from LBP is a CERCLA release. Therefore, without site-specific data, DTSC is unable to determine whether, pursuant to CERCLA 120(h)(3), all remedial actions to protect public health have been taken at Parcels 23, 29, 34, 35, and portions of 1, 16, 27, 28, and 40 with respect to potential releases of lead from LBP. In addition, DTSC cannot concur categorically that the DON has no future CERCLA liability to evaluate or remediate LBP releases into the soil should such contamination be found.</p> | <p>DON recognizes that U.S. EPA and DTSC consider the presence of exterior LBP that has been released to the soil to pose a potential CERCLA release to the environment. However, the U.S. EPA and DoD previously "agreed to disagree" on the question of natural weathering being a release of a CERCLA hazardous substance during negotiations for the joint U.S. EPA/DoD Field Guide. DoD deliberately avoided expressly endorsing or agreeing with the U.S. EPA's position in the Field Guide. The Field Guide also states that, "although EPA concluded that the release of lead to soil from lead-based paint from structures falls within the CERCLA definition of a hazardous substances release, EPA and DoD agree that for the majority of situations involving target housing (and child-occupied facilities), Title X is sufficiently protective to address hazards posed by lead-based paint.</p> <p>The CERCLA liability to evaluate and abate any LBP release/hazards does not apply to DON since DON does not consider the release of LBP by weathering a CERCLA release. The CERCLA warranty for LBP cleanup costs after transfer is not applicable based in the DON's position for releases of LBP through weathering. Any evaluation and abatement of soil-lead hazards at MCAS Tustin for nonresidential buildings and structures will be the responsibility of the future transferee unless DoD policy or generally applicable standards for nonresidential buildings/structures are promulgated after transfer.</p> |

Unresolved Comments (continued)  
Finding of Suitability to Transfer  
Marine Corps Air Station Tustin, California

|    | California Department of Toxic Substances Control (DTSC)  | United States Department of the Navy (DON)  |
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| 3. | <p>The Regional Water Quality Control Board (RWQCB) does not use risk-based clean up standards to make their "no further action" determinations for clean up at underground storage tank and aboveground storage tank (UST/AST) sites. DTSC requested a notification in the deed and a brief discussion in the FOST to inform future land owners of the cleanup criteria used for USTs located on Parcels 1 and 29 and ASTs located on Parcel 28. These USTs/ASTs were removed according to standards promulgated by the Santa Ana RWQCB. The Santa Ana RWQCB uses water protection standard as its guidelines, in order to protect the beneficial use of surface, and subsurface waters. These standards do not include a risk-based approach to clean up and therefore, on a case-by-case basis, may not be as protective as a risk-based approach may be. As a result of the standards utilized in the clean up at these AST sites, hazardous substances contained in petroleum products may have been left at the site at levels that are not protective of human health.</p> | <p>It is true that Santa Ana RWQCB focuses on protecting groundwater rather than restricting risk assessments at UST/AST sites. However, the Navy has met the agreements and requirements on the project cleanup level of 1000 mg/kg Total Petroleum Hydrocarbons (TPH) in the soil and the requirements for site closure at the referenced UST and AST sites per the California Code of Regulations. DON has complied with all requirements set forth by the Santa Ana RWQCB, the lead agency for the Leaking Underground Fuel Tank (LUFT) Program. DTSC has not cited any further statutory regulations that require DON to employ a risk-based approach to these LUFT sites.</p> <p>Section 120(h) of CERCLA requires that notification of the type and quantity of hazardous substances be included in deeds of transfer. The petroleum products in referenced UST and AST sites fall within the scope of the CERCLA petroleum exclusion set forth in section 101(14) of CERCLA and are not hazardous substances. Therefore, no notification is required.</p> |